

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**MasterGuard Corporation
1200 East Eighth Street
Veedersburg, IN 47987**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T045-10130-00011	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality <i>Original signed by Janet McCabe</i>	Issuance Date: April 23, 2001 Expiration Date: April 23, 2006

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary automotive bumper manufacturing plant.

Responsible Officials:	William M. Goldstein - agent	Jim Dodson - manager
Source Address:	1200 E. 8 th St., Veedersburg, IN	
Mailing Address:	1200 E. 8 th St., Veedersburg, IN 47987	
SIC Code:	3465	
County Location:	Fountain	
Source Location Status:	Attainment for all criteria pollutants	
Source Status:	Part 70 Permit Program	
	Minor Source, under PSD	
	Major Source, Section 112 of the Clean Air Act	

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) An electrodeposition dip coat process, identified as P-1-1 in production line 1, with a maximum capacity of 180 nominal parts per hour, and internally vented
- (b) Two clearcoat booths, together identified as P-1-3 in production line 1, with a maximum total capacity of 180 nominal parts per hour, equipped with two dry filters DF-1-3A and DF-1-3B, and exhausting through stacks S-1-3A and S-1-3B
- (c) An undercoat spray booth, identified as P-1-4, with a maximum capacity of 180 nominal parts per hour, equipped with a dry filter DF-1-4, and exhausting through stack S-1-4
- (d) Two natural gas fired boilers, identified as B-1 and B-2, each rated at 11.5 million British thermal units (MMBtu) per hour, and exhausting at stacks S-2-5 and S-2-6, respectively
- (e) Two basecoat spray booths, together identified as P-1-2 in production line 1, with a total maximum capacity of 180 nominal parts per hour, equipped with two dry filters DF-1-2A and DF-1-2B, and exhausting through stacks S-1-2A and S-1-2B
- (f) An electrodeposition dip coat process, identified as P-2-1 in production line 2, with a maximum capacity of 180 nominal parts per hour, and internally vented
- (g) Two basecoat spray booths, together identified as P-2-2 in production line 2, with a maximum total capacity of 180 nominal parts per hour, equipped with two dry filters DF-2-2A and DF-2-2B, and exhausting through stacks S-2-2A and S-2-2B
- (h) Two clearcoat booths, together identified as P-2-3 in production line 2, with a maximum total capacity of 180 nominal parts per hour, equipped with two dry filters DF-2-3A and DF-2-3B, and exhausting through stacks S-2-3A and S-2-3B
- (i) An undercoat spray booth, identified as P-2-4, with a maximum capacity of 180 nominal parts per hour, equipped with a dry filter DF-2-4, and exhausting through stack S-2-4

- (j) Two decorative chrome plating tanks, identified as CN-1 and CS-1, each with a maximum capacity of 180 nominal bumpers per hour, using fume suppressant and scrubbers SCN-1 and SCS-1 as control and exhausting through stack S-3-1. Operation of the scrubber is not required for compliance.
- (k) Two (2) spray booths applying clear undercoatings, identified as emission units P-2-5A and P-2-5B, each with a maximum capacity of 180 nominal parts per hour, with particulate matter emissions controlled by dry filters, and exhausting from stack vents S-2-5A and S-2-5B, respectively
- (l) Two chrome anodizing tanks, identified as CN-25 and CS-25, each with a maximum capacity of 90 nominal bumpers per hour, using a wetting agent and scrubbers SCN-1 and SCS-1 as control and exhausting through stack S-3-1. Operation of the scrubber is not required for compliance.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) One (1) spray booth, identified as P-2-5C, with a capacity of 80 parts per hour, equipped with a High Volume Low Pressure (HVLP) spray system, with PM overspray emissions controlled by dry filters, and with VOC emissions less than 10 tons/year and PM emissions less than 5 tons/year. [326 IAC 6-3-2(c)]
- (b) Degreasing operations, i.e. 2 Safety Kleen parts washers, that do not exceed 145 gallons per 12 months, volatility of the solvents is less than 15 mm Hg at 38°C, solvents are not agitated or heated, and not subject to 326 IAC 20-6 [326 IAC 8-3-5]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7(a)]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA), and citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)][326 IAC 2-7-6(6)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality [326 IAC 2-7-5(6)(E)].

- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3) and;
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMP's shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
 - (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.13 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

- (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana
(AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes, (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;

- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit

responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d)(3), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

at least sixty (60) days before the intended test date for all chromium electroplating facilities and no later than thirty-five (35) days prior to the intended test date for all other facilities. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test day.

The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on Sept. 11, 1998.
- (b) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (c) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68 or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
- (c) A verification to IDEM, OAQ, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ . The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
 - (A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps may constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

**C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly or semi-Annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit

and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (a) An electrodeposition dip coat process, identified as P-1-1 in production line 1, with a maximum capacity of 180 nominal parts per hour, and internally vented
- (b) Two clearcoat booths, together identified as P-1-3 in production line 1, with a maximum total capacity of 180 nominal parts per hour, equipped with two dry filters DF-1-3A and DF-1-3B, and exhausting through stacks S-1-3A and S-1-3B
- (c) An undercoat spray booth, identified as P-1-4, with a maximum capacity of 180 nominal parts per hour, equipped with a dry filter DF-1-4, and exhausting through stack S-1-4
- (e) Two basecoat spray booths, together identified as P-1-2 in production line 1, with a total maximum capacity of 180 nominal parts per hour, equipped with two dry filters DF-1-2A and DF-1-2B, and exhausting through stacks S-1-2A and S-1-2B
- (f) An electrodeposition dip coat process, identified as P-2-1 in production line 2, with a maximum capacity of 180 nominal parts per hour, and internally vented
- (g) Two basecoat spray booths, together identified as P-2-2 in production line 2, with a maximum total capacity of 180 nominal parts per hour, equipped with two dry filters DF-2-2A and DF-2-2B, and exhausting through stacks S-2-2A and S-2-2B
- (h) Two clearcoat booths, together identified as P-2-3 in production line 2, with a maximum total capacity of 180 nominal parts per hour, equipped with two dry filters DF-2-3A and DF-2-3B, and exhausting through stacks S-2-3A and S-2-3B
- (i) An undercoat spray booth, identified as P-2-4, with a maximum capacity of 180 nominal parts per hour, equipped with a dry filter DF-2-4, and exhausting through stack S-2-4
- (k) Two (2) spray booths applying clear undercoatings, identified as emission units P-2-5A and P-2-5B, each with a maximum capacity of 180 nominal parts per hour, with particulate matter emissions controlled by dry filters, and exhausting from stack vents S-2-5A and S-2-5B, respectively

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 326 IAC 8-2-9 (Miscellaneous Metal Coating)

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) and 326 IAC 8-1-2(a)(7) (VOC Compliance methods), compliance with VOC content of 4.3 pounds of VOC per gallon of coating less water for all clear coatings applied in each spray booth P-1-4, P-2-4, P-2-5A, and P-2-5B shall be based on daily volume-weighted averages, using the following equation:

$$A = 3 (C * U) / 3 U \quad \# \quad 4.3 \text{ lb VOC/gal}$$

A = Daily volume weighted average in pounds of VOC per gallon of coating, less water
C = VOC content of coating in pounds of VOC per gallon of coating, less water
U = usage rate of coating in gallons per day

Compliance with VOC content of 3.5 pounds of VOC per gallon of coating less water for all non-clear or air-dried coatings delivered at spray booth P-1-4 shall be based on daily volume-weighted averages, using the following equation:

$$A = 3 (C * U) / 3 U \quad \# \quad 3.5 \text{ lb VOC/gal}$$

A = Daily volume weighted average in pounds of VOC per gallon of coating, less water
C = VOC content of coating in pounds of VOC per gallon of coating, less water
U = usage rate of coating in gallons per day

- (b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) and 326 IAC 8-1-2(a)(7) (VOC Compliance methods), compliance with VOC content of 3.5 pounds of VOC per gallon of coating less water for all extreme performance coatings applied in spray booths P-1-2 and P-2-2 and electrodeposition dip booths P-1-1 and P-2-1, and a VOC content of 4.3 pounds of VOC per gallon of coating less water for all clearcoatings applied in spray booths P-1-3 and P-2-3, shall be based on daily volume-weighted averages, using the following equations:

For Line 1:

$$3 (C_a * U) \quad \# \quad 3 (C_l * U)$$

C_a = actual VOC content of coating in pounds of VOC per gallon of coating, less water
C_l = limited VOC content of coating in pounds of VOC per gallon of coating, less water
P-1-1 limit is 3.5 lb/gal P-1-2 limit is 3.5 lb/gal P-1-3 limit is 4.3 lb/gal
U = actual usage rate of coating in gallons per day

For Line 2:

$$3 (C_a * U) \quad \# \quad 3 (C_l * U)$$

C_a = actual VOC content of coating in pounds of VOC per gallon of coating, less water
C_l = limited VOC content of coating in pounds of VOC per gallon of coating, less water
P-2-1 limit is 3.5 lb/gal P-2-2 limit is 3.5 lb/gal P-2-3 limit is 4.3 lb/gal
U = actual usage rate of coating in gallons per day

- (c) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

- (d) The requirement from CP 045-2458, issued April 6, 1992,

“ The VOC content of the coating delivered to the applicator shall not exceed 3.5 pounds per gallon, less water, pursuant to the rule”

is not applicable because the applicators are delivering different coatings than those to which the requirement referred. Conditions D.1.1. (a) and (b) satisfy the requirements of 326 IAC 8-2-9.

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Pursuant to 326 IAC 2-2 and 40 CFR 52.21, the paint booth facilities identified in Facility Description D.1, combined, shall use less than 239 tons of VOC per 12 consecutive month period. This usage limit, along with the combined potential for boilers B-1 and B-2, and insignificant welding operations, degreasing operations, and paint booth P-2-5C to emit 11 tons of VOC per 12 consecutive month period, shall make 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the PM from the spray booths P-1-2, P-1-3, P-1-4, P-2-2, P-2-3, P-2-4, P-2-5A, and P-2-5B, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data from the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 VOC Emissions

Compliance with Condition D.1.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.8 Particulate Matter (PM)

Dry filters for PM control shall be in operation at all times when the paint booths P-1-2, P-1-3, P-1-4, P-2-2, P-2-3, P-2-4, P-2-5A, and P-2-5B are in operation.

D.1.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks S-1-2A, S-1-2B, S-1-3A, S-1-3B, S-1-4, S-2-2A, S-2-2B, S-2-3A, S-2-3B, S-2-4, S-2-5A and S-2-5B, while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2 the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily or monthly, as specified below, and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 and D.1.2.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3)
 - A. The volume weighted VOC content of the clear coatings used for each day for paint booths P-1-3, P-1-4, P-2-3, P-2-4, P-2-5A, and P-2-5B
 - B. The volume weighted VOC content of non-clear or air-dried coatings for each day for paint booth P-1-4
 - C. The volume weighted VOC content of the coatings used for each day for each coating production line 1 and 2.
 - (4) The cleanup solvent usage for each month
 - (5) The total VOC usage for each month and
 - (6) The weight of VOCs emitted for each compliance period.

- (b) To document compliance with Condition D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 and D.1.7 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Two natural gas fired boilers, identified as B-1 and B-2, each rated at 11.5 million British thermal units (MMBtu) per hour, and exhausting at stacks S-2-5 and S-2-6, respectively.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 [Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (d)], particulate emissions from boilers B-1 and B-2, combined, shall be limited to 0.48 pounds per MMBtu heat input, by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBTU) heat input

Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input.

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.

Compliance Determination Requirements

D.2.3 Fuel Usage

Boilers B-1 and B-2 shall use only natural gas as fuel. Compliance with this condition will prove compliance with 326 IAC 6-2-4.

D.2.4 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.5 Monitoring

Monitoring of these facilities is not required by this permit. However, any change or modification to this facility as specified in 326 IAC 2-1 would require this facility to have monitoring requirements.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.6 Record Keeping Requirement

Pursuant to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.40c, Subpart Dc) records shall be kept of the amounts of natural gas combusted during each month. Natural gas usage records shall be maintained for a two year period following the date of such records.

D.2.7 Reporting Requirements

A natural gas-fired boiler certification shall be submitted to the address listed in Section C - General Reporting Requirements, within thirty (30) days after the end of the quarter being reported, for each quarter that boilers B-1 and B-2 burn only natural gas for fuel. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (j) Two decorative chrome plating tanks, identified as CN-1 and CS-1, each with a maximum capacity of 180 nominal bumpers per hour, using fume suppressant and scrubbers SCN-1 and SCS-1 as control and exhausting through stack S-3-1. Operation of the scrubber is not required for compliance.
- (l) Two chrome anodizing tanks, identified as CN-25 and CS-25, each with a maximum capacity of 90 nominal bumpers per hour, using a wetting agent and scrubbers SCN-1 and SCS-1 as control and exhausting through stack S-3-1. Operation of the scrubber is not required for compliance.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the facilities described in this section except when otherwise specified in 40 CFR Part 63, Subpart N.

D.3.2 Chromium Electroplating and Anodizing NESHAP [326 IAC 20-8-1] [40 CFR Part 63, Subpart N]

The provisions of 40 CFR 63, Subpart N - National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks, which are incorporated by reference as 326 IAC 20-8-1, apply to tanks CN-1, CS-1, CN-25 and CS-25. A copy of this rule is attached.

D.3.3 Chromium Emissions Limitation [40 CFR 63.342(c)] [40 CFR 63.343(a)(1)&(2)]

- (a) The emission limitations in this condition apply only during tank operation, and also apply during periods of startup and shutdown as these are routine occurrences for tanks subject to 326 IAC 20-8-1. The emission limitations do not apply during periods of malfunction.
- (b) During tank operation, the Permittee shall control chromium emissions discharged to the atmosphere from tank tanks CN-1, CS-1, CN-25 and CS-25 by not allowing the surface tension of the electroplating bath contained within the tanks to exceed forty-five dynes per centimeter (dynes/cm) (3.1×10^{-3} pound-force per foot [lbf/ft]) at any time during operation of the tanks.

Pursuant to 40 CFR 63.343(c)(5)(i), the Permittee has accepted 45 dynes/cm as the maximum surface tension value that corresponds to compliance with the applicable emission limitation, 0.01 mg/dscm (4.4×10^{-6} gr/dscf) in lieu of establishing the maximum surface tension during an initial performance test.

D.3.4 Work Practice Standards [40 CFR 63.342(f)]

The following work practice standards apply to tanks CN-1, CS-1, CN-25 and CS-25:

- (a) At all times, including periods of startup, shutdown and malfunction, the Permittee shall operate and maintain the tanks, fume suppressant system, and monitoring equipment in a manner consistent with good air pollution control practices, consistent with the Operation and Maintenance Plan (OMP) required by Condition D.3.6.
- (b) Malfunctions and excess emissions shall be corrected as soon as practicable after their occurrence in accordance with the OMP required by Condition D.3.6.

- (c) These operation and maintenance requirements are enforceable independent of emissions limitations or other requirements in this section.
- (d) Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to IDEM, OAQ, which may include, but is not limited to, monitoring results; review of the OMP, procedures, and records; and inspection of the source.
- (e) Based on the results of a determination made under paragraph (d) of this condition, IDEM, OAQ may require that the Permittee make changes to the OMP required by Condition D.3.6. Revisions may be required if IDEM, OAQ finds that the plan:
 - (1) Does not address a malfunction or period of excess emissions that has occurred;
 - (2) Fails to provide for the operation of the tanks, air pollution control techniques (i.e., fume suppressant system), or process monitoring equipment during a malfunction or period of excess emissions in a manner consistent with good air pollution control practices; or
 - (3) Does not provide adequate procedures for correcting malfunctioning process equipment, fume suppressant system, monitoring equipment or other causes of excess emissions as quickly as practicable.

The work practice standards that address operation and maintenance must be followed during malfunctions and periods of excess emissions.

D.3.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan (PMP), in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for tanks CN-1, CS-1, CN-25 and CS-25 and the fume suppressant system.

D.3.6 Operation and Maintenance Plan [40 CFR 63.342(f)(3)]

- (a) The Permittee shall prepare an Operation and Maintenance Plan (OMP), to be implemented no later than the start-up date of tanks CN-1, CS-1, CN-25, and CS-25. The OMP shall specify the operation and maintenance criteria for the tanks, fume suppressant system, and monitoring equipment, and shall include the following elements:
 - (1) Manufacturers recommendations for maintenance of the monitoring equipment used to measure surface tension;
 - (2) A standardized checklist to document the operation and maintenance criteria for the tanks, fume suppressant system, and monitoring equipment;
 - (3) Procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions or periods of excess emissions as indicated by monitoring data do not occur;
 - (4) A systematic procedure for identifying malfunctions and periods of excess emissions of the tanks, fume suppressant system, and monitoring equipment; and for implementing corrective actions to address such malfunctions and periods of excess emissions.
- (b) The Permittee may use applicable standard operating procedures (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans such as the PMP required in Condition D.3.5, as the OMP, provided the alternative plans meet the above listed criteria in Condition D.3.6(a).

- (c) If the OMP fails to address or inadequately addresses an event that meets the characteristics of a malfunction or period of excess emissions at the time the plan is initially developed, the Permittee shall revise the OMP within forty five (45) days after such an event occurs. The revised plan shall include procedures for operating and maintaining tanks, the air pollution control device, the add-on air pollution control device and the monitoring equipment, during similar malfunction or period of excess emissions events, and a program for corrective action for such events.
- (d) If actions taken by the Permittee during periods of malfunction or period of excess emissions are inconsistent with the procedures specified in the OMP, the Permittee shall record the actions taken for that event and shall report by phone such actions within two (2) working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within seven (7) working days after the end of the event, unless the Permittee makes alternative reporting arrangements, in advance, with IDEM, OAQ.
- (e) The Permittee shall keep the written OMP on record after it is developed to be made available, upon request, by IDEM, OAQ for the life of tanks or until the tanks are no longer subject to the provisions of 40 CFR 63.340. In addition, if the OMP is revised, the Permittee shall keep previous versions of the OMPs on record to be made available for inspection, upon request by IDEM, OAQ for a period of five (5) years after each revision to the plan.

Compliance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]

D.3.7 Performance Testing [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11][40 CFR 63.343(b)(2)] [40 CFR 63.344][40CFR 63.7]

- (a) Pursuant to 40 CFR 63.343(c)(5)(i), the Permittee has accepted 45 dynes/cm as the maximum surface tension value that corresponds to compliance with the applicable emission limitation, 0.01 mg/dscm (4.4×10^{-6} gr/dscf) in lieu of establishing the maximum surface tension during an initial performance test for tanks CN-1, CS-1, CN-25, and CS-25. The Permittee is exempt from conducting a performance test only if the criteria of 40 CFR 63.343(b)(2) are met.
- (b) The Permittee is not required to test the tanks by this permit. However, IDEM, OAQ may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the emission limit of 0.01 milligrams per dry standard cubic meter shall be determined by a performance test conducted in accordance with the provisions of 40 CFR 63.344 and Section C - Performance Testing.
- (c) Any change, modification, or reconstruction of tanks CN-1, CS-1, CN-25, and CS-25, fume suppressant system, or monitoring equipment may require additional performance testing conducted in accordance with 40 CFR 63.344 and Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.8 Monitoring to Demonstrate Continuous Compliance [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)][40 CFR 63.343 (c)]

The Permittee shall monitor the surface tension of the electroplating baths in tanks CN-1, CS-1, CN-25, and CS-25. Operation of any tank at a surface tension of greater than 45 dynes per centimeter shall constitute noncompliance with the standards. The surface tension of each tank in operation shall be monitored according to the following schedule:

- (a) The surface tension shall be measured once every four (4) hours for the first forty (40) hours of operating time with a stalagmometer or a tensiometer as specified in 40 CFR 63, Appendix A, Method 306B (Surface Tension Measurement and Record Keeping for Chromium Plating Tanks Used at Electroplating and Anodizing Facilities). If a tensiometer is used to measure surface tension, the instructions given in ASTM Method D 1331-89, "Standard Test Methods for Surface and Interfacial Tension of Solutions of Surface Active Agents," must be followed.
- (b) The time between monitoring can be increased if there have been no exceedances. Once there are no exceedances in forty (40) hours of operating time, the surface tension measurement may be conducted once every eight (8) hours of operating time. Once there are no exceedances during forty (40) hours of operating time, surface tension measurement may be conducted once every forty (40) hours of operating time on an ongoing basis or on an alternative monitoring schedule approved by IDEM, OAQ until an exceedance occurs. The minimum frequency of monitoring allowed by this subpart is once every 40 hours of tank operation.
- (c) Once an exceedance occurs as indicated through tank surface tension monitoring, wetting agent shall be added and the original monitoring schedule of once every four (4) hours must be resumed. A subsequent decrease in frequency shall follow the schedule laid out in paragraph (B) above. For example, if a Permittee had been monitoring a tank once every 40 hours and an exceedance occurs, subsequent monitoring would take place once every 4 hours of tank operation. Once an exceedance does not occur for 40 hours of tank operation, monitoring can occur once every 8 hours of tank operation. Once an exceedance does not occur for 40 hours of tank operation on this schedule, monitoring can occur once every 40 hours of tank operation.
- (d) Once a tank or bath solution is drained and a new solution is added, the original surface tension monitoring schedule of once every four (4) hours must be resumed with a subsequent decrease in monitoring frequency allowed following the procedures in paragraphs (b) and (c) above.
- (e) Tank operation or operating time is defined as that time when a part is in the tank and there is a current running through the tank. If the amount of time that no part is in the tank is fifteen minutes or longer, that time is not considered operating time. Likewise, if the amount of time between placing parts in the tank (i.e., when no part is in the tank) is less than fifteen minutes, that time between plating the two parts is considered operating time.

Alternatively, the source may use the following method to determine operating time: If the tank functions with a rectifier and amperage meter which records only the times when the rectifier is operating while a part is in the tank, the operating time shall be calculated and recorded as the time the amperage meter is operating.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.9 Record Keeping Requirements [40 CFR 63.346]

The Permittee shall maintain records to document compliance with Conditions D.3.2, D.3.3, D.3.4, D.3.6 and D.3.8. These records shall be maintained in accordance with the Section C condition entitled "General Record Keeping Requirements" of this permit and include a minimum of the following:

- (a) Inspection records for the fume suppressant system and monitoring equipment to document that the inspection and maintenance required by Conditions D.3.6 and D.3.8 have taken place. The record can take the form of a checklist and should identify the following:
 - (1) The device inspected;

- (2) The date of inspection;
 - (3) A brief description of the working condition of the device during the inspection, including any deficiencies found; and
 - (4) Any actions taken to correct deficiencies found during the inspection, including the date(s) such actions were taken.
- (b) Records of all maintenance performed on tanks CN-1, CS-1, CN-25 and CS-25, the fume suppressant system, and monitoring equipment.
 - (c) Records of the occurrence, duration, and cause (if known) of each malfunction of tanks CN-1, CS-1, CN-25 and CS-25, the fume suppressant system, and monitoring equipment.
 - (d) Records of the occurrence, duration, and cause (if known) of each period of excess emissions of tanks CN-1, CS-1, CN-25 and CS-25, the fume suppressant system, and monitoring equipment as indicated by monitoring data collected in accordance with this condition.
 - (e) Records of actions taken during periods of malfunction or excess emissions when such actions are inconsistent with the OMP.
 - (f) Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the OMP.
 - (g) Test reports documenting results of all performance tests.
 - (h) All measurements as may be necessary to determine the conditions of performance tests, including measurements necessary to determine compliance.
 - (i) Records of monitoring data required by 40 CFR 63.343(c) that are used to demonstrate compliance with the standard including the date and time the data are collected.
 - (j) The total process operating time, as defined in Condition D.3.8(b), of each tank, during the reporting period.
 - (k) Records of the date and time that fume suppressants were added to the electroplating bath, and the amount and type of fume suppressants added.
 - (l) All documentation supporting the notifications and reports required by 40 CFR 63.9 and 63.10 (Subpart A, General Provisions) and by Condition D.3.10.

D.3.10 Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 3-6-4(b)][40 CFR 63.344(a), 63.345 & 63.347]

The notifications and reports required in this section shall be submitted to IDEM, OAQ using the address specified in Section C - General Reporting Requirements.

- (a) Notifications:
 - (1) Initial Notifications:
The Permittee shall notify IDEM, OAQ in writing that the source is subject to 40 CFR Part 63, Subpart N. The notification shall be submitted no later than one hundred eighty (180) days after the compliance date and shall contain the information listed in 40 CFR 63.347(c)(1).
 - (2) A Notification of Compliance Status (NCS) is required each time that the facility becomes subject to the requirements of 40 CFR Part 63 Subpart N.

- (A) The NCS shall be submitted to IDEM, OAQ, and shall list, for each tank, the information identified in 40 CFR 63.347(e)(2).
 - (B) The NCS for tanks CN-1, CS-1, CN-25 and CS-25, shall be submitted to IDEM, OAQ immediately.
- (3) Notification of Construction or Reconstruction
Pursuant to 40 CFR 63.345(b)(1), the Permittee may not construct a new tank subject to 40 CFR 63, Subpart N (including non-affected tanks defined in 40 CFR 63.344(e)) without submitting a Notification of Construction or Reconstruction (NCR) to IDEM, OAQ. In addition, the Permittee may not change, modify, or reconstruct tanks CN-1, CS-1, CN-25 and CS-25, without submitting a Notification of Construction or Reconstruction (NCR) to IDEM, OAQ.
 - (A) The NCR shall contain the information identified in 40 CFR 63.345(b)(2) and (3).
 - (B) A change, modification, or reconstruction of this facility includes any change in the air pollution control techniques, the addition of add-on control devices, or the construction of duct work for the purpose of controlling both existing tanks and non-affected facilities by a common control technique or device.
 - (C) A complete application to construct new chromium electroplating or chromium anodizing tanks serves as this notification. Likewise, the complete application to modify or reconstruct tanks CN-1, CS-1, CN-25 and CS-25 serves as this notification.
 - (D) Pursuant to 326 IAC 2-1.1-2(a), permission must be received from IDEM, OAQ before construction, modification, or reconstruction may commence.
- (b) Ongoing Compliance Status Report
The Permittee shall prepare summary reports to document the ongoing compliance status of tanks CN-1, CS-1, CN-25 and CS-25 using the Ongoing Compliance Status Report form provided with this permit. This report shall contain the information specified in 40 CFR 63.347(g)(3).

Because tanks CN-1, CS-1, CN-25 and CS-25 are located at a site that is a major source of hazardous air pollutants (HAPs), the Ongoing Compliance Status Report shall be completed and submitted according to the following schedule.

- (1) This report shall be submitted semiannually on a calendar year basis, unless otherwise directed by IDEM, OAQ. The report shall be submitted within thirty (30) days after the end of each reporting period (which ends June 30 and December 31 respectively).
- (2) If the monitoring data collected by the Permittee in accordance with 40 CFR 63.343(c) show that the emission limit has been exceeded, quarterly reports shall be submitted.

Once the Permittee reports an exceedance as defined above, Ongoing Compliance Status Reports shall be submitted quarterly until a request to reduce reporting frequency in accordance with 40 CFR 63.347(g)(2) is approved.

- (3) IDEM, OAQ may determine on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of this facility.

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Insignificant Activities:

- (a) One (1) spray booth, identified as P-2-5C, with a capacity of 80 parts per hour, equipped with a High Volume Low Pressure (HVLP) spray system, with PM overspray emissions controlled by dry filters, and with VOC emissions less than 10 tons/year and PM emissions less than 5 tons/year. [326 IAC 6-3-2]
- (b) Degreasing operations, i.e. 2 Safety Kleen parts washers, that do not exceed 145 gallons per 12 months, volatility of the solvents is less than 15 mm Hg at 38°C, solvents are not agitated or heated, and not subject to 326 IAC 20-6 [326 IAC 8-3-5]

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control), the owner or operator shall:

- (a) Equip the cleaner with a cover.
- (b) Equip the cleaner with a facility for draining cleaned parts.
- (c) Provide a permanent, conspicuous label which lists the operating requirements outlined in 326 IAC 8-3-5 (b), as outlined below.
- (d) If using a solvent spray, use a solid, fluid stream applied at a pressure which does not cause excessive splashing.
- (e) Close the cover whenever articles are not being handled in the degreaser.
- (f) Drain cleaned articles for at least fifteen seconds or until dripping ceases.
- (g) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent of the waste solvent by weight could evaporate.

D.4.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the PM from the spray booth P-2-5C shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.4.3 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: MasterGuard Corporation
Source Address: 1200 East Eighth St. Veedersburg, IN
Mailing Address: 1200 East Eighth St. Veedersburg, IN 47987
Part 70 Permit No.: T045-10130-00011

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: MasterGuard Corporation
Source Address: 1200 East Eighth St. Veedersburg, IN
Mailing Address: 1200 East Eighth St. Veedersburg, IN 47987
Part 70 Permit No.: T045-10130-00011

This form consists of 2 pages

Page 1 of 2

- | | |
|----------|---|
| 9 | 1. This is an emergency as defined in 326 IAC 2-7-1(12)
C The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16 |
|----------|---|

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: MasterGuard Corporation
Source Address: 1200 East Eighth St. Veedersburg, IN
Mailing Address: 1200 East Eighth St. Veedersburg, IN 47987
Part 70 Permit No.: T045-10130-00011

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Report period

Beginning: _____

Ending: _____

Boiler Affected

Alternate Fuel

Days burning alternate fuel
From To

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: MasterGuard Corporation
Source Address: 1200 East Eighth St. Veedersburg, IN
Mailing Address: 1200 East Eighth St. Veedersburg, IN 47987
Part 70 Permit No.: T045-10130-00011
Facility: Paint Booths P-1-3, P-1-4, P-2-3, P-2-4, P-2-5A, P-2-5B, P-1-1, P-1-2, P-2-1, P-2-2
Parameter: Input VOC
Limit: < 239 tons/year

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	Input VOC This Month	Input VOC Previous 11 Months	Input VOC 12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: MasterGuard Corporation
Source Address: 1200 East Eighth St. Veedersburg, IN
Mailing Address: 1200 East Eighth St. Veedersburg, IN 47987
Part 70 Permit No.: T045-10130-00011

Months: _____ to _____ Year: _____

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CHROMIUM ELECTROPLATING NESHAP
ONGOING COMPLIANCE STATUS REPORT**

Source Name: MasterGuard Corporation
Source Address: 1200 East Eighth St. Veedersburg, IN
Mailing Address: 1200 East Eighth St. Veedersburg, IN 47987
Part 70 Permit No.: T045-10130-00011

Tank ID #: _____ (complete this form for each affected tank CN-1, CS-1, CN-25, and CS-25)
)

Type of process: Decorative
Monitoring Parameter: Surface tension of the electroplating bath
Parameter Value: 45 dynes per centimeter
Limits: Total chromium concentration may not exceed 0.01 mg/dscm if the chromium electroplating bath does not meet 45 dynes per centimeter

This form is to be used to report compliance for the Chromium Electroplating NESHAP only.
The frequency for completing this report may be altered by the IDEM, OAQ, Compliance Branch.

submit this report no later than 30 days after the end of the reporting period.

This form consists of 2 pages

Page 1 of 2

BEGINNING AND ENDING DATES OF THE REPORTING PERIOD:
TOTAL OPERATING TIME OF THE TANK DURING THE REPORTING PERIOD:

MAJOR AND AREA SOURCES: CHECK ONE	
9	NO DEVIATIONS OF THE MONITORING PARAMETER ASSOCIATED WITH THIS TANK FROM THE COMPLIANT VALUE OR RANGE OF VALUES OCCURRED DURING THIS REPORTING PERIOD.
9	THE MONITORING PARAMETER DEVIATED FROM THE COMPLIANT VALUE OR RANGE OF VALUES DURING THIS REPORTING PERIOD (THUS INDICATING THE EMISSION LIMITATION MAY HAVE BEEN EXCEEDED, WHICH COULD RESULT IN MORE FREQUENT REPORTING).

AREA (I.E., NON-MAJOR) SOURCES OF HAP ONLY: IF DEVIATIONS OCCURRED, LIST THE AMOUNT OF TANK OPERATING TIME EACH MONTH THAT MONITORING RECORDS SHOW THE MONITORING PARAMETER DEVIATED FROM THE COMPLIANT VALUE OR RANGE OF VALUES.			
JAN	APR	JUL	OCT
FEB	MAY	AUG	NOV
MAR	JUN	SEP	DEC

HARD CHROME TANKS / MAXIMUM RECTIFIER CAPACITY LIMITED IN ACCORDANCE WITH 40 CFR 63.342(c)(2) ONLY: LIST THE ACTUAL AMPERE-HOURS CONSUMED (BASED ON AN AMP-HR METER) BY THE INDIVIDUAL TANK.			
JAN	APR	JUL	OCT
FEB	MAY	AUG	NOV
MAR	JUN	SEP	DEC

CHROMIUM ELECTROPLATING NESHAP ONGOING COMPLIANCE STATUS REPORT

ATTACH A SEPARATE PAGE IF NEEDED

Page 2 of 2

IF THE OPERATION AND MAINTENANCE PLAN REQUIRED BY 40 CFR 63.342 (f)(3) WAS NOT FOLLOWED, PROVIDE AN EXPLANATION OF THE REASONS FOR NOT FOLLOWING THE PLAN AND DESCRIBE THE ACTIONS TAKEN FOR THAT EVENT:

DESCRIBE ANY CHANGES IN TANKS, RECTIFIERS, CONTROL DEVICES, MONITORING, ETC. SINCE THE LAST STATUS REPORT:

ADDITIONAL COMMENTS:

ALL SOURCES: CHECK ONE

9 I CERTIFY THAT THE WORK PRACTICE STANDARDS IN 40 CFR 63.342(f) WERE FOLLOWED IN ACCORDANCE WITH THE OPERATION AND MAINTENANCE PLAN ON FILE; AND, THAT THE INFORMATION CONTAINED IN THIS REPORT IS ACCURATE AND TRUE TO THE BEST OF MY KNOWLEDGE.

9 THE WORK PRACTICE STANDARDS IN 40 CFR 63.342(f) WERE NOT FOLLOWED IN ACCORDANCE WITH THE OPERATION AND MAINTENANCE PLAN ON FILE, AS EXPLAINED ABOVE AND/OR ON ATTACHED.

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification from a responsible official* to complete this report.

* A responsible official (40 CFR 63.2) for a corporation is defined as a president, secretary, treasurer, or vice president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities and either: (i) The facilities employ more than 250 persons or have gross annual sales or expenditures exceeding \$ 25 million (in second quarter 1980 dollars); or (ii) The delegation of authority to such representative is approved in advance by the Administrator.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name: Master Guard Corporation
Source Location: 1200 East Eighth St., Veedersburg, IN 47987
County: Fountain
SIC Code: 3465
Operation Permit No.: T045-10130-00011
Permit Reviewer: Barbara J. Goldblatt

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Master Guard Corporation relating to the operation of an automotive bumper manufacturing plant.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) A dip coat process, identified as P-1-1, with a maximum capacity of 180 nominal parts per hour, and internally vented.
- (b) Two clearcoat booths, together identified as P-1-3, with a maximum total capacity of 180 nominal parts per hour, equipped with two dry filters DF-1-3A and DF-1-3B, and exhausting through stacks S-1-3A and S-1-3B.
- (c) An undercoat spray booth, identified as P-1-4, with a maximum capacity of 180 nominal parts per hour, equipped with a dry filter DF-1-4, and exhausting through stack S-1-4.
- (d) Two (2) spray booths applying clear undercoatings, identified as emission units P-2-5A and P-2-5B, each with a maximum capacity of 180 nominal parts per hour, with particulate matter emissions controlled by dry filters, and exhausting from stack vents S-2-5A and S-2-5B, respectively.

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted facilities/units:

- (a) Two basecoat spray booths, together identified as P-1-2, with a total maximum capacity of 180 nominal parts per hour, equipped with two dry filters DF-1-2A and DF-1-2B, and exhausting through stacks S-1-2A and S-1-2B.
- (b) A dip coat process, identified as P-2-1, with a maximum capacity of 180 nominal parts per hour, and internally vented.

- (c) Two basecoat spray booths, together identified as P-2-2, with a maximum total capacity of 180 nominal parts per hour, equipped with two dry filters DF-2-2A and DF-2-2B, and exhausting through stacks S-2-2A and S-2-2B.
- (d) Two clearcoat booths, together identified as P-2-3, with a maximum total capacity of 180 nominal parts per hour, equipped with two dry filters DF-2-3A and DF-2-3B, and exhausting through stacks S-2-3A and S-2-3B.
- (e) An undercoat spray booth, identified as P-2-4, with a maximum capacity of 180 nominal parts per hour, equipped with a dry filter DF-2-4, and exhausting through stack S-2-4.
- (f) Two decorative chrome plating tanks, identified as CN-1 and CS-1, each with a maximum capacity of 180 nominal bumpers per hour, using fume suppressant and scrubbers SCN-1 and SCS-1 as control and exhausting through stack S-3-1. Operation of the scrubber is not required for compliance.
- (g) Two natural gas fired boilers, identified as B-1 and B-2, each rated at 11.5 million British thermal units (MMBtu) per hour, and exhausting at stacks S-2-5 and S-2-6, respectively.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) One (1) 4.5 MMBtu/hr natural gas-fired preheating oven
- (b) One (1) 2.5 MMBtu/hr natural gas-fired curing oven
- (c) Natural gas-fired cure ovens, air make-up units, heating units, and hot water heating units with heat input equal to or less than 10 MMBtu per hr
- (d) Propane lift trucks with heat input equal to or less than 6 MMBtu per hour
- (e) Two back-up diesel generators, each with a capacity equal to or less than .5 MMBtu per hour
- (f) Flame safety purging on startup of sludge dryer and boilers
- (g) Propane tank having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month, used for fork lifts
- (h) Packaging of lubricants and greases
- (i) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases
- (j) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings
- (k) Machining where an aqueous cutting coolant, i.e. maintenance fluid, continuously floods the machining interface
- (l) Degreasing operations, i.e. 2 Safety Kleen parts washers, that do not exceed 145 gallons per 12 months, and not subject to 326 IAC 20-6

- (m) Cleaners and solvents, i.e. Safety Kleen 153, having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or having a vapor pressure equal to or less than 0.78 kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months
- (n) The following equipment related to manufacturing activities not resulting in the emission of HAPs; brazing equipment, cutting torches, soldering equipment, welding equipment:
 - (1) Extender welding with and without cartridge filters
- (o) Closed loop heating and cooling systems
- (p) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume
- (q) Operation using aqueous solutions containing less than 1% by weight of VOC excluding HAP
- (r) Forced and induced draft cooling tower system not regulated under a NESHAP
- (s) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment
- (t) Paved and unpaved roads and parking lots with public access
- (u) Underground conveyors
- (v) Blowdown for any of the following: sight glass; boiler; compressor; pumps; and cooling tower
- (w) On-site fire and emergency response training approved by the department
- (x) Two diesel generators, i.e. 167.7 HP and 68 HP, not exceeding 1600 horsepower
- (y) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations:
 - (1) Polishing with and without cyclones
 - (2) Stamping and forming processes
 - (3) Hand grinding
- (z) A laboratory as defined in 326 IAC 2-7-1(20)(C)
- (aa) A waste sludge dryer with cyclone and with emissions equal to or less than threshold values
- (bb) Welding operations on production lines 1 and 2

Existing Approvals

- (a) The source has been operating under previous approvals including, but not limited to, the following:
 - (1) CP 045-2458, issued April 6, 1992
 - (2) Minor Source Modification T 045-10663-00011, issued May 21, 1999
- (b) All conditions from previous approvals were incorporated into this Part 70 permit except the following:

CP 045-2458, issued April 6, 1992:

"The VOC content of the coating delivered to the applicator shall not exceed 3.5 pounds per gallon less water pursuant to the rule.", from CP 045-2458, shall not be incorporated into this Part 70 Permit for the following reasons:

The CP -045-2458 permitted units, P-1-1, P-1-3, and P-1-4, previously applied water based, powder, and solvent based coatings which were required by 326 IAC 8-2-9 to not exceed 3.5 pounds VOC per gallon of coating. P-1-1 currently uses coatings dried at temperatures exceeding 90° C, which are required by 326 IAC 8-2-9 to not exceed 3 pounds VOC/gallon of coating, which this Part 70 Permit will limit to not exceed 3 pounds VOC/gal through daily volume weighted averages, pursuant to 326 IAC 8-1-2(a)(7). P-1-3 and P-1-4 currently use clear coatings which are required by 326 IAC 8-2-9 to not exceed 4.3 pounds VOC/gallon of coating, and which this Part 70 Permit will limit to not exceed 4.3 pounds VOC/gal through daily volume weighted averages, pursuant to 326 IAC 8-1-2(a)(7). P-1-4 sometimes uses non-clear or air-dried coatings which are required by 326 IAC 8-2-9 to not exceed 3.5 pounds VOC/gallon of coating, and which this Part 70 Permit will limit to not exceed 3.5 pounds VOC/gal through daily volume weighted averages, pursuant to 326 IAC 8-1-2(a)(7).

Enforcement Issue

IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment*.

IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

- (a) Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.
- (b) An administratively complete Part 70 permit application for the purposes of this review was received on Sept. 11, 1998.

Emission Calculations

See Appendix A of this document for detailed emissions calculations.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

Pollutant	Potential To Emit (tons/year)
PM	greater than 100
PM-10	greater than 100
SO ₂	less than 100
VOC	greater than 250
CO	less than 100
NO _x	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
xylene	greater than 10
toluene	greater than 10
ethyl benzene	greater than 10
methyl isobutyl ketone	greater than 10
glycol ethers	greater than 10
ethylene glycol	less than 10
chromium	less than 10
cumene	less than 10
TOTAL	greater than 25

The potential to emit (as defined in 326 IAC 2-1.1-1(16)) VOC and PM-10 are equal to or greater than 100 tons per year. The potential to emit (as defined in 326 IAC 2-1.1-1(16)) any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1997 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	27.008
PM-10	22.929
SO ₂	0.098
VOC	234.016
CO	4.758
NO _x	20.270
HAP	not available

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the emission units.

Process/facility	Limited Potential to Emit VOC (tons/year)
Paint booths : P-1-3, P-1-4, P-2-3, P-2-4, P-2-5A, P-2-5B ¹ and P-1-1, P-1-2, P-2-1, P-2-2 ²	< 240
Insignificant activities: Degreasing operations ³	6
Welding operations ⁴	3
Boilers B-1 and B-2 ⁵	1
Total Emissions	< 250

¹ using compliant clear coatings, including daily volume weighted averages (DVWA) for clear coatings, # 4.3 lb VOC/gal coating excluding water, or using compliant non-clear or air dried coatings, including DVWA for non-clear or air dried coatings, # 3.5 lb VOC/gal coating excluding water

² using compliant coatings dried at temperatures exceeding 90°C, including daily volume weighted averages for coatings dried at temperatures exceeding 90° C, # 3 lb VOC/gal coating excluding water

³ PTE = 145 gal solvents/month . 12 months/yr * 7 lb VOC/gal solvent * 1ton/2000lb

⁴ PTE = 15 lbs VOC /day * 365days/yr * 1ton/2000 lbs

⁵ PTE = Potential Throughput (MMCF/yr) * Emission Factor (lb/MMCF) * 1ton/2000 lb

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu) * 8,760 hrs/yr * 1 MMCF/1000 MMBtu

Emission Factor = 5.5 lb/MMCF (from AP 42, table 1.4-2)

Heat Input Capacity = 23MMBtu/hr

County Attainment Status

The source is located in Fountain County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Fountain County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

- (a) Boilers B-1 and B-2 are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.40c, Subpart Dc) because they were constructed after June 9, 1989 and have a heat input capacity greater than 10 million Btu per hour but equal to or less than 100 million Btu per hour.

Pursuant to this rule, the following conditions shall apply:

- (1) Records shall be kept of the amounts of natural gas combusted during each month.
 - (2) Natural gas usage records shall be maintained for a two year period following the date of such records.
- (b) The chromium electroplating operations are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 326 IAC 14, (40 CFR 63, Subpart N, and 326 IAC 20-1-1). Pursuant to 40 CFR 63, Subpart N, and 326 IAC 20-1-1, the chromium electroplating operations are subject to the following conditions:
- (1) The surface tension of the chromium electroplating bath contained with the tank shall not exceed forty-five (45) dynes per centimeter at any time during the operation of the tank if a chemical fume suppressant containing a wetting agent is used to demonstrate compliance.
 - (2) Each time that surface tension monitoring exceeds forty-five (45) dynes per centimeter, the frequency of monitoring must revert back to every four (4) hours of tank operation. After forty (40) hours of monitoring tank operation every four (4) hours with no exceedances, surface tension measurement may be conducted once every eight (8) hours of tank operation. Once there have been no exceedances during forty (40) hours of tank operation, surface tension measurement may be conducted once every forty (40) hours of tank operation on an ongoing basis, until an exceedance occurs.
 - (3) An alternative emission limit of 0.01 milligram per day standard cubic meter (mg/dscm) will be applicable if the chromium electroplating bath does not meet the limit above.
 - (4) A summary report shall be prepared to document the ongoing compliance status of the chromium electroplating operation. The report shall be submitted semiannually on a calendar year basis, unless otherwise directed by IDEM, OAM. The report shall be submitted to:

Indiana Department of Environmental Management
Air Compliance Branch, Office of Air Management
Chromium Electroplating
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206

within thirty (30) days after the end of each reporting period, which ends June 30 and December 31 respectively.

If the monitoring data collected by the Permittee in accordance with Permit Condition D.3.6 show that the emission limit has been exceeded, quarterly reports shall be submitted. Once the Permittee reports an exceedance, ongoing compliance status reports shall be submitted quarterly until a request to reduce reporting frequency, according to the procedures of 40 CFR 63.347(g)(2), is approved.

- (5) The chromium electroplating operations shall be subject to the record keeping and reporting requirement as indicated in the chromium electroplating NESHAP.

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart N.

- (c) The insignificant degreasing operation is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 40 CFR 63, Subpart T, due to the use of solvents that do not contain specified halogenated HAP greater than 5% by weight.

State Rule Applicability - Entire Source

326 IAC 2-4.1-1 (New source toxics control)

The source is a major source of HAP as defined in 326 IAC 2-4.1-1, due to its potential to emit a single HAP at a level greater than 10 tons/year and due to its potential to emit any combination of HAP at a level greater than 25 tons/year. However, since the source was constructed prior to July 27, 1997, 326 IAC 2-4.1-1 will not apply. Likewise, 326 IAC 2-4.1-1 will not apply to units pursuant to Minor Source Modification T 045-10663-00011, issued May 21, 1999, because the revision is not classified as a reconstruction under 40 CFR 63.41, and the revision does not by itself have the potential to emit 10 tons per year of any HAP or 25 tons per year of any combination of HAP.

326 IAC 2-2 (PSD)

The potential to emit (PTE) any air pollutant from the source is greater than 250 tons per year, therefore, 326 IAC 2-2 (PSD) would apply. The source has requested a facility-wide emission limit of < 250 tons of VOC per consecutive 12 month period. Therefore, 326 IAC 2-2 will not apply.

326 IAC 1-5-2 (Emergency Reduction Plans)

The source submitted an Emergency Reduction Plan (ERP) on Sept. 11, 1998. The ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than 100 tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 8-2-9 (Miscellaneous Metal Coating)

- (a) Pursuant to 326 IAC 8-1-2(a)(7) (VOC Compliance methods)
- (1) the volatile organic compound (VOC) content of coatings delivered to the applicators at spray booths P-1-3, P-1-4, P-2-3, P-2-4, P-2-5A, and P-2-5B, shall be limited to a Daily Volume Weighted Average (DVWA) $\#$ 4.3 pounds of VOC per gallon of coating less water, for clear coatings.
 - (2) non-clear or air-dried coatings delivered at spray booth P-1-4 shall be limited to a DVWA $\#$ 3.5 lb VOC per gallon of coating less water.
 - (3) VOC content of coatings applied in spray booths P-1-1, P-1-2, P-2-1 and P-2-2 shall be limited to a DVWA $\#$ 3 pounds of VOC per gallon of coating less water, for coatings dried at temperatures exceeding 90°C.

DVWA shall be determined by the following equations:

$$A = 3 (C * U) / 3 U \# 4.3 \text{ lb VOC/gal}$$

or

$$A = 3 (C * U) / 3 U \# 3.5 \text{ lb VOC/gal}$$

or

$$A = 3 (C * U) / 3 U \# 3 \text{ lb VOC/gal}$$

A = Daily volume weighted average in pounds VOC per gallon
C = VOC content of coating in pounds VOC per gallon
U = usage rate of coating in gallons per day

Based on the information submitted by the source and calculations made, the spray booths are in compliance with these requirements.

- (b) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from each of the spray booths P-1-2, P-1-3, P-1-4, P-2-2, P-2-3, P-2-4, P-2-5A, and P-2-5B, shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The dry filters shall be in operation at all times the spray booths are in operation, in order to comply with this limit.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

The insignificant degreasing operation is subject to the requirements of 326 IAC 8-3-5 because it was constructed after July 1, 1990. Since the volatility of the solvents is less than 15 mm Hg at 38°C and the solvent is not agitated or heated, the owner or operator of the degreasing operation shall:

- (a) Equip the cleaner with a cover.
- (b) Equip the cleaner with a facility for draining cleaned parts.
- (c) Provide a permanent, conspicuous label which lists the operating requirements outlined in 326 IAC 8-3-5 (b), as outlined below.
- (d) If using a solvent spray, use a solid, fluid stream applied at a pressure which does not cause excessive splashing.
- (e) Close the cover whenever articles are not being handled in the degreaser.
- (f) Drain cleaned articles for at least fifteen seconds or until dripping ceases.
- (g) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent of the waste solvent by weight could evaporate.

326 IAC 6-2 (Particulate Emissions from Sources of Indirect Heating)

Particulate matter emissions from the two natural gas fired boilers, B-1 and B-2, each rated at 11.5 million British thermal units (MMBtu) per hour and constructed after Sept. 21, 1983, shall be limited by the following equation, pursuant 326 IAC 6-2-4:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Pt = pounds of PM emitted per MMBtu heat input
Q = source maximum operating capacity

$$Pt = \frac{1.09}{23.0^{0.26}} = 0.48 \text{ lb/MMBtu}$$

Based on the PTE particulate calculations shown in Appendix A, the two boilers, combined, have the PTE 0.8 tons particulates/year and therefore are in compliance with these requirements.

Compliance Requirements

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: MasterGuard Corporation
Source Location: 1200 E. Eighth St. Veedersburg, IN 47987
County: Fountain
SIC Code: 3465
Operation Permit No.: T 045 - 10130 - 00011
Permit Reviewer: B.J. Goldblatt

On September 8, 1999, the Office of Air Management (OAM) arranged for the publication of a notice in the Fountain County Neighbor, Attica, Indiana, stating that MasterGuard Corporation had applied for a Part 70 Operating Permit to operate an automotive bumper coating manufacturing plant. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

The Office of Air Management (OAM) was recently given the new name of Office of Air Quality (OAQ). Name changes will not be noted with BOLD and "line through" formatting in this Addendum, but the issued permit will reflect such changes.

Upon further review, and partly due to the issuance of Permit Exemption No. 045-11371-00011 on October 22, 1999, Second Minor Source Modification No.: 045-11822-00011 on March 15, 2000, and Agreed Order, Cause No. 1999-8764-A on October 18, 2000, the OAQ has decided to make the following revisions to the permit. Bolded language has been added, the language with a line through it has been deleted. The Table of Contents has been modified to reflect these changes.

1. Second Minor Source Modification No.: 045-11822-00011, issued on March 15, 2000, included the following emission units, which have been added to section A.2, Emission Units and Pollution Control Equipment Summary and D.3, Facility Description:
 - (I) **Two chrome anodizing tanks, identified as CN-25 and CS-25, each with a maximum capacity of 90 nominal bumpers per hour, using a wetting agent and scrubbers' SCN-1 and SCS-1 as control and exhausting through stack S-3-1. Operation of the scrubber is not required for compliance.**
2. Permit Exemption No. 045-11371-00011, issued on October 22, 1999, included emission unit P-2-5C, which has the PTE 1.03 tons of VOC/year, and which has been added to Sections A.3, D.1.2, and D.4. Insignificant spray booth P-2-5C has been estimated to emit 1 pound of VOC per year. Subsequently, this Addendum to the Technical Support Document notes that paint booths P-1-3, P-1-4, P-2-3, P-2-4, P-2-5A, P-2-5B, P-1-1, P-1-2, P-2-1, and P-2-2, combined, will have a limited PTE VOC of < 239 tons/year, so that total VOC emissions will remain < 250 tons/year. Changes to the Quarterly Reporting form have been noted near the end of this Addendum. Sections A.3, D.1.2, and D.4 have been changed as follows: (Also see Source Comment # 2 in this Addendum)

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

~~(a) Natural gas-fired cure ovens, air make-up units, heating units, and hot water heating units with heat input equal to or less than 10 MMBtu per hr~~

~~(b) Propane lift trucks with heat input equal to or less than 6 MMBtu per hour~~

~~(c) Two back-up diesel generators, each with a capacity equal to or less than .5 MMBtu per hour~~

~~(d) Flame safety purging on startup of sludge dryer and boilers~~

~~(e) Propane tank having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month, used for fork lifts~~

~~(f) Packaging of lubricants and greases~~

~~(g) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases~~

~~(h) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings~~

~~(i) Machining where an aqueous cutting coolant, i.e. maintenance fluid, continuously floods the machining interface~~

~~(j) Degreasing operations, i.e. 2 Safety Kleen parts washers, that do not exceed 145 gallons per 12 months, and not subject to 326 IAC 20-6~~

~~(k) Cleaners and solvents, i.e. Safety Kleen 153, having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or having a vapor pressure equal to or less than 0.78 kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months~~

~~(l) The following equipment related to manufacturing activities not resulting in the emission of HAPs; brazing equipment, cutting torches, soldering equipment, welding equipment:~~

~~Extender welding with and without cartridge filters~~

~~(m) Closed loop heating and cooling systems~~

~~(n) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume~~

~~(o) Operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs~~

~~(p) Forced and induced draft cooling tower system not regulated under a NESHAP~~

- _____ (q) ~~Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment~~
- _____ (r) ~~Paved and unpaved roads and parking lots with public access~~
- _____ (s) ~~Underground conveyors~~
- _____ (t) ~~Blowdown for any of the following: sight glass; boiler; compressor; pumps; and cooling tower~~
- _____ (u) ~~On-site fire and emergency response training approved by the department~~
- _____ (v) ~~Two diesel generators, i.e. 167.7 HP and 68 HP, not exceeding 1600 horsepower~~
- _____ (w) ~~Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations:~~
 - _____ (1) ~~Polishing with and without cyclones~~
 - _____ (2) ~~Stamping and forming processes~~
 - _____ (3) ~~Hand grinding~~
- _____ (x) ~~A laboratory as defined in 326 IAC 2-7-1(20)(C)~~
- _____ (y) ~~A waste sludge dryer with cyclone and with emissions equal to or less than threshold values~~
- _____ (z) ~~One (1) 4.5 MMBtu/hr natural gas-fired preheating oven~~
- _____ (aa) ~~One (1) 2.5 MMBTU/hr natural gas-fired curing oven~~
 - (a) **One (1) spray booth, identified as P-2-5C, with a capacity of 80 parts per hour, equipped with a High Volume Low Pressure (HVLP) spray system, with PM overspray emissions controlled by dry filters and with VOC emissions less than 10 tons/year and PM emissions less than 5 tons/year [326 IAC 6-3-2(c)]**
 - (b) **Degreasing operations, i.e. 2 Safety Kleen parts washers, that do not exceed 145 gallons per 12 months, volatility of the solvents is less than 15 mm Hg at 38°C, solvents are not agitated or heated, and not subject to 326 IAC 20-6 [326 IAC 8-3-5]**

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Pursuant to 326 IAC 2-2 and 40 CFR 52.21, the paint booth facilities identified in Facility Description D.1, combined, shall use less than **240 239** tons of VOC per 12 consecutive month period. This usage limit, along with the combined potential for insignificant boilers B-1 and B-2, **and** insignificant welding operations, **and** degreasing operations, **and paint booth P-2-5C** to emit **40 11** tons of VOC per 12 consecutive month period, shall make 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Insignificant Activities:

- (a) **One (1) spray booth, identified as P-2-5C, with a capacity of 80 parts per hour, equipped with a High Volume Low Pressure (HVLV) spray system, with PM overspray emissions controlled by dry filters, and with VOC emissions less than 10 tons/year and PM emissions less than 5 tons/year.**
- (b) Degreasing operations, i.e. 2 Safety Kleen parts washers, that do not exceed 145 gallons per 12 months, volatility of the solvents is less than 15 mm Hg at 38°C, solvents are not agitated or heated, and not subject to 326 IAC 20-6

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control), the owner or operator shall:

- (a) Equip the cleaner with a cover.
- (b) Equip the cleaner with a facility for draining cleaned parts.
- (c) Provide a permanent, conspicuous label which lists the operating requirements outlined in 326 IAC 8-3-5 (b), as outlined below.
- (d) If using a solvent spray, use a solid, fluid stream applied at a pressure which does not cause excessive splashing.
- (e) Close the cover whenever articles are not being handled in the degreaser.
- (f) Drain cleaned articles for at least fifteen seconds or until dripping ceases.
- (g) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent of the waste solvent by weight could evaporate.

D.4.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the PM from the spray booth P-2-5C shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.4-2 3 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test ~~this facility~~ **these facilities** by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

3. The following changes have been made to Section B:

SECTION B

GENERAL CONDITIONS

B.1 ~~Permit No Defense~~ [IC 13]

- ~~(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.~~
- ~~(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."~~

B.2 1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, ~~any~~ **the** applicable definitions found in **the statutes or regulations** (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.32 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the **effective original** date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. **Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.**

B.4 3 Enforceability [326 IAC 2-7-7(a)]

- ~~(a) Unless otherwise stated, A~~ **Unless other wise stated, A** all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM , **the United States Environmental Protection Agency (U.S. EPA), and citizens in accordance with the Clean Air Act.**
- ~~(b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.~~

B.5 4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is

invalid shall not affect the validity of the remainder of the permit.

B.7 6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort; or any exclusive privilege.

B.8-7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] -[326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee requires the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

- ~~(c) The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records or, for information claimed to be confidential, the Permittee must may furnish such records directly to IDEM, OAQ, the U. S. EPA along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAQ, or the U.S. EPA, to furnish. [326 IAC 2-7-5(6)(E)]~~

- (c) **The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing** copies of requested records directly to U. S. EPA, ~~and if the Permittee is making~~ **may assert** a claim of confidentiality ~~regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under~~ **in accordance with 40 CFR 2, Subpart B.**

B.9 8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, **except those specifically designated as not federally enforceable**, constitutes a violation of the Clean Air Act and is grounds for:

- (1) Enforcement action;
- (2) Permit termination, revocation and reissuance, or modification; or
- (3) Denial of a permit renewal application.

- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance

with the conditions of this permit.

- (b) **An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.**

B.40 9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted ~~under this permit~~ shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, ~~and any other certification required under this permit~~, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, ~~on~~**using** the attached Certification Form, with each submittal **requiring certification**.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.44-10 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The **initial** certification **shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications** shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The **appropriate** identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was ~~based on~~ continuous or intermittent data;

- (4) The methods used for determining **the** compliance **status** of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3) and;
- (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.42-11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

-
- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; **and**
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond ~~its~~ **the Permittee's** control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the ~~Preventive Maintenance Plans~~ **PMPs** as necessary to ensure that ~~lack of proper maintenance~~ **failure to implement a PMP** does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) **A copy of the PMP's** shall be submitted to IDEM, OAQ, upon request **and within a reasonable time**, and shall be subject to review and approval by IDEM, OAQ. **IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**
- (d) **Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three**

(3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.43 12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted ~~notice, either in writing or facsimile, of the emergency~~ **the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile** to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) ~~for sources subject to this rule after the effective date of this rule.~~ This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in ~~compliance~~ **accordance** with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.1413 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) ~~This condition provides a permit shield as addressed in 326 IAC 2-7-15.~~

Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted. This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been

modified to reflect such new requirements.

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. **All previously issued operating permits are superseded by this permit.** ~~Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:~~
- (1) ~~The applicable requirements are included and specifically identified in this permit; or~~
- (2) ~~The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.~~
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, ~~including any term or condition from a previously issued construction or operation permit~~, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. **Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.**
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
- (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
- (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
- (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.15 14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs

contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.46 15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch **Data Section**, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

~~within ten (10) calendar days from the date of the discovery of the deviation.~~
using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The notification by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) ~~An emergency as defined in 326 IAC 2-7-1(12); or~~
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) ~~Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- ~~(c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the “responsible official” as defined by 326 IAC 2-7-1(34).~~

- ~~(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.~~

- (c) **Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report**

B.47 16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated

noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] **The notification by the Permittee requires the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).**

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.48 17 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). **The renewal application requires the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).**

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
 - (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this

existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, , takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, , any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19-18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) ~~The Permittee must comply with~~ **Permit amendments and modifications are governed by** the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) ~~only if a certification is required by the terms of the applicable rule.~~

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.24 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

~~The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:~~

- (a) ~~For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in~~

~~emissions, and any permit term or condition that is no longer applicable as a result of the change.~~

- ~~(b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).~~

B.22 20 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any **preconstruction** approval required by 326 IAC ~~2-4~~ **2-7-10.5** has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana
(AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) ~~For each such change,~~ **The Permittee may make** Section 502(b)(10) of the Clean Air Act ~~change;~~ **changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change,** the required written notification shall include the following :

- (1) A brief description of the change within the source;

- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- ~~(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.~~

B.23 21 Construction Permit Source Modification Requirement [326 IAC 2-7-10.5]

~~Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, A~~
modification, construction, or reconstruction ~~shall be approved as required by and in accordance with~~ **is governed by 326 IAC 2 and 326 IAC 2-7-10.5.**

B.24 22 Inspection and Entry [326 IAC 2-7-6(2)][IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, **and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such,** the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, ~~at reasonable times,~~ any records that must be kept under the conditions of this permit;
- (c) Inspect, ~~at reasonable times,~~ any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, ~~at reasonable times,~~ substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

~~[326 IAC 2-7-6(6)]~~

- (1) ~~The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAQ, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAQ, nor an authorized representative, may disclose the information unless and until IDEM, OAQ, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]~~
- (2) ~~The Permittee and IDEM, OAQ, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]~~

B.25 23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.26 24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. **Pursuant 326 IAC 2-7-19(b)**, if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) **Except as provided in 326 IAC 2-7-19(e)**, failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the

appropriate permit fee.

4. The following changes have been made to some of the Conditions in Section C:

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary ~~Exemptions~~ **Alternative Opacity Limitations**), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. **326 IAC 9-1-2 is not federally enforceable.**

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. **The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d)(3), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.**

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61-140, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;

- (B) Removal or demolition contractor; or
- (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the **applicable** emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are **mandatory applicable** for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing **methods any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures** approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

at least sixty (60) days before the intended test date for all chromium electroplating facilities and no later than thirty-five (35) days prior to the intended test date for all other facilities. **The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

- (b) The Permittee shall ~~submit a notice~~ **notify IDEM, OAQ** of the actual test date ~~to the above address so that it is received at least two weeks prior to the test date.~~
- ~~(b) All test reports must be received by IDEM, OAQ, within forty-five (45) days after the~~

~~completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) at least fourteen (14) days prior to the end of the initial forty-five (45) day period- actual test day.~~

The ~~documentation~~ **notification** submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

~~G.10 Compliance Schedule [326 IAC 2-7-6(3)]~~

~~The Permittee:~~

- ~~(a) Has certified that all facilities at this source are in compliance with all applicable requirements; and~~
- ~~(b) Has submitted a statement that the Permittee will continue to comply with such requirements; and~~
- ~~(c) Will comply with such applicable requirements that become effective during the term of this permit.~~

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

~~Compliance with applicable requirements shall be documented as required by this permit.~~

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule that equipment cannot be met installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the

“responsible official” as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, **40 CFR 60 Appendix B, 40 CFR 63**, or other approved methods as specified in this permit.

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall **submit**:

(a) ~~Submit:~~

(1) A compliance schedule for meeting the requirements of 40 CFR 68 ~~by the date provided in 40 CFR 68.10(a);~~ or

(b) ~~(2)~~ As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(c) ~~(3)~~ A verification to IDEM, OAQ, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

~~(b) Provide annual certification to IDEM, OAQ, that the Risk Management Plan is being properly implemented.~~

All documents submitted pursuant to this condition shall include the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] ~~[326 IAC 1-6]~~

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. **The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the This compliance monitoring plan is comprised of incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:**

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

- (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ, . The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) **Reasonable** response steps that ~~will~~ **may** be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking ~~such~~ **reasonable** response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, ~~appropriate~~ **reasonable** response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to ~~perform the actions detailed in the compliance monitoring conditions or failure to take the~~ **take reasonable** response steps ~~within the time prescribed in the Compliance Response Plan, shall~~ **may** constitute a violation of the permit ~~unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.~~
- (c) ~~After investigating the reason for the~~ **Upon investigation of a compliance monitoring** excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) **A false reading occurs due to the malfunction of** the monitoring equipment ~~malfunctioned, giving a false reading.~~ This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned **or is returning** to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e) **All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.**

- (f) **At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.**

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate ~~corrective~~ **response** actions. The Permittee shall submit a description of these ~~corrective~~ **response** actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize **excess** emissions from the affected facility while the ~~corrective~~ **response** actions are being implemented. ~~IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.~~
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. ~~Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.~~
- (c) **IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.**

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
- (1) Indicate **estimated** actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate **estimated** actual emissions of other regulated pollutants (**as defined by 326 IAC 2-7-1**) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement requires the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

~~C.18 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]~~

- ~~(a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.~~
- ~~(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.~~
- ~~(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.~~
- ~~(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.~~
- ~~(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.~~
- ~~(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.~~

~~C.4918 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]~~

- ~~(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of two (2) **three (3)** years and available upon the request of an IDEM, OAQ, representative. The records may be stored elsewhere for the remaining **three (3)** **two (2)** years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.~~
- ~~(b) **Unless otherwise specified in this permit** Records of required monitoring information shall include, where applicable:~~
 - ~~(1) The date, place, and time of sampling or measurements;~~
 - ~~(2) The dates analyses were performed;~~
 - ~~(3) The company or entity performing the analyses;~~
 - ~~(4) The analytic techniques or methods used;~~

- ~~(5) — The results of such analyses; and~~
- ~~(6) — The operating conditions existing at the time of sampling or measurement.~~
- ~~(c) — Support information shall include, where applicable:~~
 - ~~(1) — Copies of all reports required by this permit;~~
 - ~~(2) — All original strip chart recordings for continuous monitoring instrumentation;~~
 - ~~(3) — All calibration and maintenance records;~~
 - ~~(4) — Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C- Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.~~
- ~~(d) — A all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.~~

C.2420 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- ~~(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~
- ~~(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:~~

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- ~~(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is~~

due.

- (d) Unless otherwise specified in this permit, any quarterly **or semi-Annual report required in Section D of this permit** shall be submitted within thirty (30) days of the end of the reporting period. The reports ~~do not~~ require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) ~~All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~
- (f) ~~Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.~~
- (g) ~~The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.~~

Stratospheric Ozone Protection

~~C.20~~ **19** Compliance with 40 CFR 82 and 326 IAC 22-1

5. The following changes have been made to Section D.3:

- D.3.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]**
The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the ~~facility~~ **facilities** described in this section except when otherwise specified in 40 CFR Part 63, Subpart N.
- D.3.2 Chromium Electroplating and Anodizing NESHAP [326 IAC 20-8-1][40 CFR Part 63, Subpart N]**
~~This facility is subject to~~ **The provisions of 40 CFR Part 63, Subpart N - National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks, which is are** incorporated by reference as 326 IAC 20-8-1, **apply to tanks CN-1, CS-1, CN-25 and CS-25.** A copy of this rule is attached.
- D.3.3 Chromium Emissions Limitation [40 CFR 63.342(c)] [40 CFR 63.343(a)(1)&(2)]**
 - (a) **The emission limitations in this condition apply only during tank operation, and also apply during periods of startup and shutdown as these are routine occurrences for tanks subject to 326 IAC 20-8-1. The emission limitations do not apply during periods of malfunction.**
 - (b) During tank operation, the Permittee shall control chromium emissions discharged to the atmosphere from tanks CN-1, ~~and CS-1,~~ **CN-25 and CS-25** by not allowing the surface tension of the electroplating bath contained within each tank to exceed forty-five (45) dynes per centimeter (dynes/cm) (3.1 x 10⁻³ pound-force per foot [lbf/ft]) at any time during operation of the tanks.
Pursuant to 40 CFR 63.343(c)(5)(i), the Permittee has accepted 45 dynes/cm as the maximum surface tension value that corresponds to compliance with the applicable emission limitation, 0.01 mg/dscm (4.4 x 10⁻⁶ gr/dscf) in lieu of establishing the maximum surface tension during an initial performance test.

D.3.4 Work Practice Standards [40 CFR 63.342(f)]

The following work practice standards apply to tanks CN-1, CS-1, CN-25 and CS-25:

~~(b)~~ — The following work practice standards for the tanks are also applicable:

~~(1)~~ —

(a) At all times, including periods of startup, shutdown and malfunction, the Permittee shall operate and maintain the tanks, fume suppressant, and monitoring equipment in a manner consistent with good air pollution control practices, consistent with the Operation and Maintenance Plan (OMP) required by Condition ~~D.3.4~~ **D.3.6**.

(b) ~~(2)~~ Malfunctions **and excess emissions** shall be corrected as soon as practicable after their occurrence in accordance with the OMP required by Condition ~~D.3.4~~ **D.3.6**.

(c) **These operation and maintenance requirements are enforceable independent of emissions limitations or other requirements in this section.**

~~(d)(3)~~ — Determination of whether acceptable operation and maintenance procedures are being used will be based on the information available to IDEM, OAQ, which may include, but is not limited to, monitoring results; review of the OMP, procedures and records; and inspection of the source.

~~(e)(4)~~ — Based on the results of the determination made under Condition ~~D.3.2(b)(3)~~ above, **paragraph (d) of this condition**, IDEM, OAQ may require that the Permittee make changes to the OMP **required by Condition D.3.6**. Revisions may be required if IDEM, OAQ finds that the plan:

~~(1)(A)~~ — Does not address a malfunction **or period of excess emissions** that has occurred;

~~(2)(B)~~ — Fails to provide for the operation of the tanks, air pollution control techniques (i.e., fume suppressant **system**), or process monitoring equipment during a malfunction **or period of excess emissions** in a manner consistent with good air pollution control practices; or

~~(3)(C)~~ — Does not provide adequate procedures for correcting malfunctioning process equipment, ~~air pollution control techniques~~ fume suppressant system, or monitoring equipment, **or other causes of excess emissions** as quickly as practicable.

The work practice standards that address operation and maintenance must be followed during malfunctions and periods of excess emissions.

D.3.3 3.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan (PMP), in accordance with Section B.42 - Preventive Maintenance Plan, of this permit, is required for tanks CN-1, ~~and CS-1~~, **CN-25 and CS-25 and the fume suppressant system.**

~~D.3.4~~ 3.6 Operation and Maintenance Plan [40 CFR 63.342(f)(3)]

-
- (a) **The Permittee shall prepare** an Operation and Maintenance Plan (OMP), ~~in accordance with 40 CFR 63.342(f)(3), shall be prepared and to be~~ implemented no later than the ~~compliance~~ **start-up** date of tanks **CN-1, CS-1, CN-25 and CS-25**. The OMP shall specify the operation and maintenance criteria for ~~the tanks CN-1 and CS-1,~~ fume suppressant **system**, and monitoring equipment, and shall include the following elements:
- (1) Manufacturers recommendations for maintenance of the monitoring equipment used to measure surface tension;
 - (2) ~~Documentation of~~ **A standardized checklist to document** the operation and maintenance criteria for the tanks, fume suppressant **system**, and monitoring equipment;
 - (3) Procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions **or periods of excess emissions as indicated by monitoring data** do not occur;
 - (4) A systematic procedure for identifying malfunctions **and periods of excess emissions** of the tanks, fume suppressant **system**, and monitoring equipment; and for implementing corrective actions to address such malfunctions **and periods of excess emissions**.
- (b) **The Permittee may use applicable standard operating procedures (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans such as the PMP required in Condition D.3.5, as the OMP, provided the alternative plans meet the above listed criteria in Condition D.3.6(a).**
- (b) (c) If the OMP fails to address or inadequately addresses an event that meets the characteristics of a malfunction **or period of excess emissions** at the time the plan is initially developed, the Permittee shall revise the OMP within forty five (45) days after such an event occurs. **The revised plan shall include procedures for operating and maintaining tanks, the air pollution control device, the add-on air pollution control device and the monitoring equipment, during similar malfunction or period of excess emissions events, and a program for corrective action for such events.**
- (d) **If actions taken by the Permittee during periods of malfunction or period of excess emissions are inconsistent with the procedures specified in the OMP, the Permittee shall record the actions taken for that event and shall report by phone such actions within two (2) working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within seven (7) working days after the end of the event, unless the Permittee makes alternative reporting arrangements, in advance, with IDEM, OAQ.**
- (e) **The Permittee shall keep the written OMP on record after it is developed to be made available, upon request, by IDEM, OAQ for the life of tanks, or until the tank is no longer subject to the provisions of 40 CFR 63.340. In addition, if the OMP is revised, the Permittee shall keep previous versions of the OMPs on record to be made available for inspection, upon request by IDEM, OAQ for a period of five (5) years after each revision to the plan.**
- (c) ~~Recordkeeping associated with the OMP is identified in Condition D.3.7. Reporting associated with the OMP is identified in Condition D.3.8.~~

Compliance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]

D.3-5 3.7 Performance Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11] [40 CFR

63.343(b)(2)][40 CFR 63.7] [40 CFR 63.344]

- (a) **Pursuant to 40 CFR 63.343(c)(5)(i), the Permittee has accepted 45 dynes/cm as the maximum surface tension value that corresponds to compliance with the applicable emission limitation, 0.01 mg/dscm (4.4×10^{-6} gr/dscf) in lieu of establishing the maximum surface tension during an initial performance test for tanks CN-1, CS-1, CN-25, and CS-25. The Permittee is exempt from conducting a performance test only if the criteria of 40 CFR 63.343(b)(2) are met.**
- (b) The Permittee is not required to test this facility by this permit. However, IDEM, OAQ may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the emission limit of 0.01 milligrams per dry standard cubic meter shall be determined by a performance test conducted in accordance with the provisions of 40 CFR 63.344 and **Section C - Performance Testing.**
- (c) **Any change, modification, or reconstruction of tanks CN-1, CS-1, CN-25, and CS-25, fume suppressant system, or monitoring equipment may require additional performance testing conducted in accordance with 40 CFR 63.344 and Section C - Performance Testing.**

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.6 3.8 Monitoring to Demonstrate Continuous Compliance [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)][40 CFR 63.343 (c)(5) & (7)]

The Permittee shall monitor the surface tension of the electroplating baths in tanks CN-1, and CS-1, **CN-25 and CS-25**. Operation of ~~either~~ **any** tank at a surface tension of greater than 45 dynes per centimeter shall constitute noncompliance with the standards. The surface tension of each tank in operation shall be monitored according to the following schedule:

- (a) The surface tension shall be measured once every four (4) hours for the first forty (40) hours of operating time with a stalagmometer or a tensiometer as specified in 40 CFR 63, Appendix A, Method 306B (Surface Tension Measurement and Record Keeping for Chromium Plating Tanks Used at Electroplating and Anodizing Facilities). If a tensiometer is used to measure surface tension, the instructions given in ASTM Method D 1331-89, "Standard Test Methods for Surface and Interfacial Tension of Solutions of Surface Active Agents," must be followed.
- (b) The time between monitoring can be increased if there have been no exceedances. Once there are no exceedances in forty (40) hours of operating time, the surface tension measurement may be conducted once every eight (8) hours of operating time. Once there are no exceedances during forty (40) hours of operating time, surface tension measurement may be conducted once every forty (40) hours of operating time on an ongoing basis or on an alternative monitoring schedule approved by IDEM, OAQ until an exceedance occurs. **The minimum frequency of monitoring allowed by this subpart is once every 40 hours of tank operation.**
~~The source agrees to conduct surface tension measurements, at a minimum, once each day of operation provided there are no more than forty (40) hours of operating time between successive surface tension measurements.~~
- (c) Once an exceedance occurs **as indicated** through tank surface tension ~~measurement,~~ **monitoring**, wetting agent shall be added and the original monitoring schedule of once every four (4) hours must be resumed. A subsequent decrease in frequency of ~~monitoring surface tension is allowed as stated in Condition D.3.6(b) above:~~ **shall**

follow the schedule laid out in paragraph (B) above. For example, if a Permittee had been monitoring a tank once every 40 hours and an exceedance occurs, subsequent monitoring would take place once every 4 hours of tank operation. Once an exceedance does not occur for 40 hours of tank operation, monitoring can occur once every 8 hours of tank operation. Once an exceedance does not occur for 40 hours of tank operation on this schedule, monitoring can occur once every 40 hours of tank operation.

- (d) Once a tank or bath solution is drained and a new solution is added, the original surface tension monitoring schedule of once every four (4) hours must be resumed with a subsequent decrease in monitoring frequency allowed ~~as stated in Condition D.3.6(b)~~ **following the procedures in paragraphs (b) and (c) above.**
- (e) ~~Operating time for chromium electroplating is that time when the rectifier is turned on and a part is in the tank. When there is no part in a tank for fifteen (15) or more minutes, that time will not be considered operating time; likewise, if the time between placing a part in the tank is less than fifteen (15) minutes, that time will be considered part of the operating time.~~

Tank operation or operating time is defined as that time when a part is in the tank and there is a current running through the tank. If the amount of time that no part is in the tank is fifteen minutes or longer, that time is not considered operating time. Likewise, if the amount of time between placing parts in the tank (i.e., when no part is in the tank) is less than fifteen minutes, that time between plating the two parts is considered operating time.

Alternatively, the source may use the following method to determine operating time: If the tank functions with a rectifier and amperage meter which records only the times when the rectifier is operating while a part is in the tank, the operating time shall be calculated and recorded as the time the amperage meter is operating.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.7 3.9 Record Keeping Requirements [40 CFR 63.346]

- ~~(a)~~ — The Permittee shall maintain records to document compliance with Conditions D.3.2, **D.3.3**, D.3.4, **D.3.6** and **D.3.8**. These records shall be maintained in accordance with the Section C condition entitled "General Record Keeping Requirements" of this permit, ~~be kept for a period of five (5) years,~~ and include a minimum of the following:
 - (1) — ~~Records of monitoring data required by 40 CFR 63.343(c) that are used to demonstrate compliance with the standard, i.e., surface tension of the bath in each tank, including the date and time the data are collected. If a tensiometer is used to measure surface tension, a copy of ASTM Method D 1331-89, "Standard Test Methods for Surface and Interfacial Tension of Solutions of Surface Active Agents," must be included with the log book containing surface tension measurements.~~
 - (2) — ~~The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs.~~
 - (3) — ~~The total process operating time of each tank, not both combined, during the reporting period.~~
 - (4) — ~~Records of the date, time, and amount of fume suppressants added to the electroplating bath(s).~~

- ~~(5) All documentation supporting the notifications and reports required by 40 CFR 63.9 and 63.10 (Subpart A, General Provisions) and by Condition D.3.8.~~
- ~~(6) Inspection and maintenance records documenting source's use of the manufacturer's recommendations for inspecting and maintaining the monitoring equipment used to measure surface tension.~~
- ~~(b) The Permittee shall keep the written OMP on record after it is developed to be made available, upon request, by IDEM, OAQ for the life of the tanks or until the tanks are no longer subject to the provisions of 40 CFR 63.340. In addition, if the OMP is revised, the Permittee shall keep previous versions of the OMP on record to be made available for inspection, upon request by IDEM, OAQ for a period of five (5) years after each revision to the plan.~~
- (a) Inspection records for the fume suppressant system and monitoring equipment to document that the inspection and maintenance required by Conditions D.3.6 and D.3.8 have taken place. The record can take the form of a checklist and should identify the following:**
 - (1) The device inspected;**
 - (2) The date of inspection;**
 - (3) A brief description of the working condition of the device during the inspection, including any deficiencies found; and**
 - (4) Any actions taken to correct deficiencies found during the inspection, including the date(s) such actions were taken.**
- (b) Records of all maintenance performed on tanks CN-1, CS-1, CN-25 and CS-25, the fume suppressant system, and monitoring equipment.**
- (c) Records of the occurrence, duration, and cause (if known) of each malfunction of tanks CN-1, CS-1, CN-25 and CS-25, the fume suppressant system, and monitoring equipment.**
- (d) Records of the occurrence, duration, and cause (if known) of each period of excess emissions of tanks CN-1, CS-1, CN-25 and CS-25, the fume suppressant system, and monitoring equipment as indicated by monitoring data collected in accordance with this condition.**
- (e) Records of actions taken during periods of malfunction or excess emissions when such actions are inconsistent with the OMP.**
- (f) Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the OMP.**
- (g) Test reports documenting results of all performance tests.**
- (h) All measurements as may be necessary to determine the conditions of performance tests, including measurements necessary to determine compliance.**
- (i) Records of monitoring data required by 40 CFR 63.343(c) that are used to demonstrate compliance with the standard including the date and time the data**

are collected.

- (j) **The total process operating time, as defined in Condition D.3.8(b), of each tank, during the reporting period.**
- (k) **Records of the date and time that fume suppressants were added to the electroplating bath, and the amount and type of fume suppressants added.**
- (l) **All documentation supporting the notifications and reports required by 40 CFR 63.9 and 63.10 (Subpart A, General Provisions) and by Condition D.3.10.**

D.3.8 3.10 Reporting Requirements [40 CFR 63.345 & 63.347]

- ~~(a) In accordance with 40 CFR 63.345, a notification must be submitted to IDEM, OAQ prior to any change, modification, or reconstruction of the facility (including conducting electroplating operations that fall under the definition of hard chromium electroplating) or construction of a new facility or source. Notification shall be submitted as soon as practicable before the date construction or reconstruction commences.~~
- ~~(b) In accordance with 40 CFR 63.347(c)(2), a notification of the date when construction or reconstruction was commenced shall be submitted to IDEM, OAQ no later than thirty (30) calendar days after such date. In addition, a notification of the actual date of startup of the new or reconstructed facility or source shall be submitted to IDEM, OAQ within thirty (30) calendar days after such date. Additional notifications required under 40 CFR 63.345 and 63.347 shall be specified as they become due.~~
- ~~(c) The Permittee shall notify IDEM, OAQ in writing of their intention to conduct a performance test at least sixty (60) calendar days before the test is scheduled to begin. Reports of performance test results shall be submitted no later than forty-five (45) days following the completion of the performance test, and shall be submitted as part of a notification of compliance status as described in 40 CFR 63.347(e), to the address listed in the Section C condition entitled "Performance Testing" of this permit.~~
- ~~(d) If actions taken by the Permittee during periods of malfunction are inconsistent with the procedures specified in the OMP required in Condition D.3.4, the Permittee shall record the actions taken for that event and shall report by phone such actions within two (2) working days after commencing actions inconsistent with the OMP. This report shall be followed by a letter within seven (7) working days after the end of the event, unless the Permittee makes alternative reporting arrangements, in advance, with IDEM, OAQ.~~
- ~~(e) The Permittee shall submit a summary report to document the ongoing compliance status of the facility using the Ongoing Compliance Status Report form provided with this permit. The report shall contain the information specified in 40 CFR 63.347(g)(3) that is applicable. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~
 - ~~(1) This report shall be submitted semiannually on a calendar year basis, unless otherwise directed by IDEM, OAQ. The report shall be submitted within thirty (30) days after the end of each reporting period, which ends June 30 and December 31 respectively.~~
 - ~~(2) If the monitoring data collected by the Permittee in accordance with Condition D.3.6 show that the emission limit has been exceeded, quarterly reports shall be submitted. Once the Permittee reports an exceedance, ongoing compliance status reports shall be submitted quarterly until a request to reduce reporting frequency, according to the procedures of 40 CFR 63.347(g)(2), is approved.~~

The notifications and reports required in this section shall be submitted to IDEM, OAQ using the address specified in Section C - General Reporting Requirements.

(a) Notifications:

(1) Initial Notifications:

The Permittee shall notify IDEM, OAQ in writing that the source is subject to 40 CFR Part 63, Subpart N. The notification shall be submitted no later than one hundred eighty (180) days after the compliance date and shall contain the information listed in 40 CFR 63.347(c)(1).

(2) A Notification of Compliance Status (NCS) is required each time that the facility becomes subject to the requirements of 40 CFR Part 63 Subpart N.

(A) The NCS shall be submitted to IDEM, OAQ, and shall list, for each tank, the information identified in 40 CFR 63.347(e)(2).

(B) The NCS for tanks CN-1, CS-1, CN-25 and CS-25, shall be submitted to IDEM, OAQ immediately.

(3) Notification of Construction or Reconstruction

Pursuant to 40 CFR 63.345(b)(1), the Permittee may not construct a new tank subject to 40 CFR 63, Subpart N (including non-affected tanks defined in 40 CFR 63.344(e)) without submitting a Notification of Construction or Reconstruction (NCR) to IDEM, OAQ. In addition, the Permittee may not change, modify, or reconstruct tanks CN-1, CS-1, CN-25 and CS-25, without submitting a Notification of Construction or Reconstruction (NCR) to IDEM, OAQ.

(A) The NCR shall contain the information identified in 40 CFR 63.345(b) (2) and (3).

(B) A change, modification, or reconstruction of this facility includes any change in the air pollution control techniques, the addition of add-on control devices, or the construction of duct work for the purpose of controlling both existing tanks and non-affected facilities by a common control technique or device

(C) A complete application to construct new chromium electroplating or chromium anodizing tanks serves as this notification. Likewise, the complete application to modify or reconstruct tanks CN-1, CS-1, CN-25 and CS-25 serves as this notification.

(D) Pursuant to 326 IAC 2-1.1-2(a), permission must be received from IDEM, OAQ before construction, modification, or reconstruction may commence.

(b) Ongoing Compliance Status Report

The Permittee shall prepare summary reports to document the ongoing compliance status of tanks CN-1, CS-1, CN-25 and CS-25 using the Ongoing Compliance Status Report form provided with this permit. This report shall contain the information specified in 40 CFR 63.347(g)(3).

Because tanks CN-1, CS-1, CN-25 and CS-25 are located at a site that is a major source of hazardous air pollutants (HAPs), the Ongoing Compliance Status Report

shall be completed and submitted according to the following schedule.

(1) This report shall be submitted semiannually on a calendar year basis, unless otherwise directed by IDEM, OAQ. The report shall be submitted within thirty (30) days after the end of each reporting period (which ends June 30 and December 31 respectively).

(2) If the monitoring data collected by the Permittee in accordance with 40 CFR 63.343(c) show that the emission limit has been exceeded, quarterly reports shall be submitted.

Once the Permittee reports an exceedance as defined above, Ongoing Compliance Status Reports shall be submitted quarterly until a request to reduce reporting frequency in accordance with 40 CFR 63.347(g)(2) is approved.

(3) IDEM, OAQ may determine on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of this facility.

6. The Emergency/Deviation Occurrence Report on draft permit pages 41 & 42 has been replaced with the Emergency Occurrence Report, which is included near the end of this Addendum. The Quarterly Compliance Monitoring Report on draft permit page 45 has been replaced with the Quarterly Deviation and Compliance Monitoring Report, which is included on the last two pages of this Addendum.

The following verbatim comments on the proposed Part 70 permit were submitted by MasterGuard on Oct. 12, 1999. The cover page of the permit has been changed to reflect a one-word format for the source name, as indicated in the written correspondence.

~~Master Guard~~

MasterGuard

Comment #1:

"Section A.2, Emission Units and Pollution Control Equipment. We would request that the dip coat processes identified in paragraphs (a) and (e) be identified as an "electrodeposition dip coat process". The electrodeposition process achieves higher transfer efficiencies than a normal dip coat process, and as discussed in our comments for Condition D.1.1, we believe that we should be able to "credit" this higher transfer efficiency in our compliance demonstrations."

Response #1:

Please see Response #5 for electrodeposition dip booth ID changes.

Comment #2:

“Section A.3, Specifically Regulated Insignificant Activities. *This section lists sources that are supposedly subject to specific regulatory limits. However, there are no sources, which are subject to specific limits as indicated in Section D.4 of the permit. As such, we would request that Section A.3 of the permit be amended accordingly.”*

Response #2:

Please see OAQ change 2, in this Addendum page 1.

Comment # 3:

“Condition C.1, Particulate Matter Emission Limitations for Processes with Process Weight Less Than One Hundred (100) pounds per hour. *We would request that this condition be removed, as it is not consistent with the applicable regulation. The process weight table found at 326 IAC 6-3 starts with a minimum process weight rate of 100 tons/year. The rule does not indicate that any limit would apply to process weights less than 100 lbs./hr. The rule does provide a formula for ‘interpolating’ between values in the Table, but not for ‘extrapolating’ beyond the limits of the table. For this reason, we would Request that this condition be deleted.”*

Response #3:

326 IAC 6-3-2 is applicable to operations at any process weight rate, unless a process is otherwise regulated by 326 IAC 6-1. There is nothing in this rule which states otherwise. There has been no change to this condition.

Comment #4:

“Source Operation Condition C.15, Compliance Monitoring Plan - Failure to Take Response Steps. *We do not believe that 40 CFR Part 70, or 326 IAC 2-7 provides any authority to require the preparation of a Compliance Response Plan (CRP) or to establish the basis for a violation of the permit for failure to conduct the identified response steps. Failure to take specific response steps should not be interpreted in any way as evidence of non-compliance with an underlying applicable requirement, which is implied by this permit condition. We would request that all references to a Compliance Response Plan be eliminated from this condition.”*

Response #4:

326 IAC 2-7-16 is applicable during emergencies, and supersedes 326 IAC 1-6 in times of emergency. Other portions of 326 IAC 1-6 are still relevant to Title V sources, including 326 IAC 1-6-3 (Preventive Maintenance Plans), and 326 IAC 1-6-5 (Excessive Malfunctions). There has been no change to permit conditions as a result of this comment. However, see OAQ change 4 for some language changes to condition C.15.

IDEM has worked with members of the Clean Air Act Advisory Council's Permit Committee, Indiana Manufacturing Association, Indiana Chamber of Commerce and individual applicants regarding the Preventive Maintenance Plan, the Compliance Monitoring Plan and the Compliance Response Plan. The plans are fully supported by rules promulgated by the Air Pollution Control Board. The plans are the mechanism each permittee will use to verify continuous compliance with its permit and the applicable rules and will form the basis for each permittee's Annual Compliance Certification. Each permittee's ability to verify continuous compliance with its air pollution control requirements is a central goal of the Title V and FESOP permit programs.

The regulatory authority for and the essential elements of a compliance monitoring plan were clarified in IDEM's Compliance Monitoring Guidance, in May 1996. IDEM originally placed all the preventive maintenance requirements in the permit section titled “Preventive Maintenance Plan.” Under that section the permittee's Preventive Maintenance Plan (PMP) had to set out requirements for the

inspection and maintenance of equipment both on a routine basis and in response to monitoring. Routine maintenance was a set schedule of inspections and maintenance of the equipment. The second was inspection and maintenance in response to monitoring that showed that the equipment was not operating in its normal range. This monitoring would indicate that maintenance was required to prevent the exceedance of an emission limit or other permit requirement.

The maintenance plan was to set out the "corrective actions" that the permittee would take in the event an inspection indicated an "out of specification situation", and also set out the time frame for taking the corrective action. In addition, the PMP had to include a schedule for devising additional corrective actions for out of compliance situations that the source had not predicted in the PMP. All these plans, actions and schedules were part of the Preventive Maintenance Plan, with the purpose of maintaining the permittee's equipment so that an exceedance of an emission limit or violation of other permit requirements could be prevented.

After issuing the first draft Title V permits on public notice in July of 1997, IDEM received comments from members of the regulated community regarding many of the draft permit terms, including the PMP requirements. One suggestion was that the corrective action and related schedule requirements be removed from the PMP requirement and placed into some other requirement in the permit. This suggestion was based, in some part, on the desire that a permittee's maintenance staff handle the routine maintenance of the equipment, and a permittee's environmental compliance and engineering staff handle the compliance monitoring and steps taken in reaction to an indication that the facility required maintenance to prevent an environmental problem.

IDEM carefully considered this suggestion and agreed to separate the "corrective actions" and related schedule requirements from the PMP. These requirements were placed into a separate requirement, which IDEM named the Compliance Response Plan (CRP). In response to another comment, IDEM changed the name of the "corrective actions" to "response steps." That is how the present CRP requirements became separated from the PMP requirement, and acquired their distinctive nomenclature.

The Compliance Monitoring Plan is made up of the PMP, the CRP, the compliance monitoring and compliance determination requirements in section D of the permit, and the record keeping and reporting requirements in sections C and D. IDEM decided to list all these requirements under this new name, the Compliance Monitoring Plan (CMP), to distinguish them from the PMP requirements. The section D provisions set out which facilities must comply with the CMP requirement. The authority for the CMP provisions is found at 326 IAC 2-7-5(1), 2-7-5(3), 2-7-5(13), 2-7-6(1), 1-6-3 and 1-6-5.

Comment # 5:

"Condition D.1.1 Miscellaneous Metal Coating. We would request that several changes be made to this condition to accurately reflect the applicable limits, and the compliance determination methodologies contained in Articles 8. First, we believe that the base coats applied in booths P-1-2 and P-2-2 and the dip coats applied in P-2-1 and P-2-2 are subject to the extreme performance limit of 3.5 lbs/gallon rather than the limit of 3.0 lbs/gallon for baked coatings. The coating system applied to the bumpers are exposed to detergents, abrasive agents, and outdoor weather at all times consistent with the definitions of "extreme performance coating" found at 326 IAC 8-2-9(d)(3). We have constructed similar facilities in other states (Illinois), which have essentially the same rules. Illinois has determined that the 'extreme performance' limit is an appropriate limit for our coating system including the dip coat and base-coat materials.

Secondly, we believe that in using a daily-weighted average, the average should be by coating line, not by limit category. 326 IAC 8-1-2-(a)(7) states that 'A daily volume weighted average of all coating applied in a coating line subject to the requirements of 36 IAC 8-2- or 8-5-5.... We believe that this would include the coatings applied in the electrodeposition dip coat, the basecoat booth and the topcoat booth. While this would require a methodology to compute both actual and allowable emission on a daily basis, we believe that such a methodology is provided for in similar federal regulations as discussed below.

Thirdly, we do not believe that the formula provided in this condition accurately reflects the requirements

of 326 IAC 8-1-2. Demonstrating compliance with the limit requires conversion of the limit to either an equivalent limit expresses in pounds of VOC per gallon of coating solids per 326 IAC 8-1-2(b), or the use of an equivalent limit expresses as pounds of VOC per gallon of coating solids deposited per 326 IAC 8-1-2(a)(9)(A). We would request that this later form of the limit be used, since our electrodeposition dip coat process achieves a much higher transfer efficiency than achieved by spray coating methods. EPA has in fact assigned a 95% transfer efficiency for the electrodeposition process in similar regulations under the New Source Performance Standards (NSPS) regulations (sec 40 CFR 60 Subpart SS 60.453 (b)(1) provides an appropriate methodology (when used for a daily, rather than monthly averaging period) for demonstrating compliance using the provisions of 326 IAC 8-1-2(a)(7) & (9) and 326 IAC 8-1-2(b).

We would propose that Condition D.1.1(a) be amended to read as follows to incorporate these recommended changes:

D.1.1 326 IAC 8-2-9 (Miscellaneous Metal Coating)

- d) Pursuant to 326 IAC 8-2-9 (miscellaneous Metal Coating Operations) and 326 IAC 8-1-2(a)(9) (VOC Compliance Methods), the following limits shall apply to the metal surface coating operations:

17.3 pounds of VOC per gallon of coating solids deposited for all clear coats.

11.2 pounds of VOC per gallon of solids deposited for all basecoats, and electrodeposited dip coats.

- e) Compliance with these limits shall be based on a daily-weighted average of all coatings applied on each coating line. Emissions units P-1-1, P-1-2, P-1-3 and P-1-4 shall be combined as one line. Emission units P-2-1, P-2-2, P-2-3, P-2-4, P-2-5A and P-2-5B shall be treated as one line. Compliance with the emission limits shall be determined by comparing the daily allowable VOC emissions (AL) with the daily actual VOC emissions (AC) consistent with the requirements of 326 IAC 8-1-2(a) 7, 326 IAC 8-1-2(a)(9) and 326 IAC 8-1-2(b) as follows.

- (i) The total amount of coating solids deposited per day for each coating applied shall be calculated using the following formula:

$$DS_i = Vs_i \times G_i \times T_i$$

Where: DS_i = the total solids deposited for a single coating
 Vs_i = Volume percent solids for each coating
 G_i = Gallons of coating applied each day
 T_i = Transfer efficiency (60%) for spray coating and 95 % for dip coating)

- (ii) The total daily allowable VOC emissions for each line shall be calculated using the following formula:

$$AL = 3 DS_i \times L_i$$

Where: AL = Daily allowable VOC emissions
 L_i = VOC limit in lbs. VOC/gallon coating solids deposited contained in Paragraph (a) of this condition for each coating used.

- (ii) *The total actual VOC emissions for each coating line shall be calculated Using the following formula:*

$$AC = 3G_i \times V_i$$

Where: AC = Daily actual VOC emissions for each line.
 V_i = VOC content of each coating in lbs. VOC per gallon of coating as applied"

Response #5:

As a result of comment #5, and Pursuant to 326 IAC 8-2-9(d)(3), extreme performance coatings applied at paint booths P-1-1, P-1-2, P-2-1, and P-2-2 shall be limited to less than or equal to 3.5 lbs of VOC per gallon of coating.

IDEM has interpreted 326 IAC 8-1-2(a)(7) to allow for the use of daily volume weighted averages (DVWA) to demonstrate compliance within each production line. IDEM understands from MasterGuard's consulting firm that production line 1 consists of emission units P-1-1, P-1-2, and P-1-3. Production line 2 consists of units P-2-1, P-2-2, and P-2-3.

326 IAC 8-1-2 (a)(9)(A) is not an EPA-approved State Implementation Plan (SIP) for demonstrating compliance with 326 IAC 8-2-9. OAQ is in the process of developing revised SIP approved rules to substitute for 326 IAC 8-1-2 (a)(9)(A), and when those rules are adopted, the Part 70 Permit could be modified to allow the use of compliance methods consistent with the new rules.

As a result of comments #1, #5 and #8, and because of daily volume weighted averaging within a production line, the following changes have been made to the facility descriptions A.2 and D.1, and permit conditions D.1.1 and D.1.10:

A.2 and D.1:

- (a) An **electrodeposition** dip coat process, identified as P-1-1 **in production line 1**, with a maximum capacity of 180 nominal parts per hour, and internally vented
- (b) Two clearcoat booths, together identified as P-1-3 **in production line 1**, with a maximum total capacity of 180 nominal parts per hour, equipped with two dry filters DF-1-3A and DF-1-3B, and exhausting through stacks S-1-3A and S-1-3B
- (e) Two basecoat spray booths, together identified as P-1-2 **in production line 1**, with a total maximum capacity of 180 nominal parts per hour, equipped with two dry filters DF-1-2A and DF-1-2B, and exhausting through stacks S-1-2A and S-1-2B
- (f) An **electrodeposition** dip coat process, identified as P-2-1 **in production line 2**, with a maximum capacity of 180 nominal parts per hour, and internally vented
- (g) Two basecoat spray booths, together identified as P-2-2 **in production line 2**, with a maximum total capacity of 180 nominal parts per hour, equipped with two dry filters DF-2-2A and DF-2-2B, and exhausting through stacks S-2-2A and S-2-2B
- (h) Two clearcoat booths, together identified as P-2-3 **in production line 2**, with a maximum total capacity of 180 nominal parts per hour, equipped with two dry filters DF-2-3A and DF-2-3B, and exhausting through stacks S-2-3A and S-2-3B

D.1.1 326 IAC 8-2-9 (Miscellaneous Metal Coating)

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) and 326 IAC 8-1-

2(a)(7) (VOC Compliance methods), compliance with VOC content of 4.3 pounds of VOC per gallon of coating less water for all clear coatings applied in **each** spray booths P-1-3, P-1-4, P-2-3, P-2-4, P-2-5A, and P-2-5B shall be based on daily volume-weighted averages, using the following equation:

$$A = 3 (C * U) / 3 U \quad \# \quad 4.3 \text{ lb VOC/gal}$$

A = Daily volume weighted average in pounds of VOC per gallon of coating, less water
 C = VOC content of coating in pounds of VOC per gallon of coating, less water
 U = usage rate of coating in gallons per day

Compliance with VOC content of 3.5 pounds of VOC per gallon of coating less water for all non-clear or air-dried coatings delivered at spray booth P-1-4 shall be based on daily volume-weighted averages, using the following equation:

$$A = 3 (C * U) / 3 U \quad \# \quad 3.5 \text{ lb VOC/gal}$$

A = Daily volume weighted average in pounds of VOC per gallon of coating, less water
 C = VOC content of coating in pounds of VOC per gallon of coating, less water
 U = usage rate of coating in gallons per day

- (b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) and 326 IAC 8-1-2(a)(7) (VOC Compliance methods), compliance with VOC content of ~~3~~**3.5** pounds of VOC per gallon of coating less water for all **extreme performance** coatings ~~dried at temperatures exceeding 90°C,~~ applied in spray booths ~~P-1-1, P-1-2, P-2-1 and P-2-2~~ **and electrodeposition dip booths P-1-1 and P-2-1, and a VOC content of 4.3 pounds of VOC per gallon of coating less water for all clearcoatings applied in spray booths P-1-3 and P-2-3,** shall be based on daily volume-weighted averages, using the following equations:

~~$$A = 3 (C * U) / 3 U \quad \# \quad 3.5 \text{ lb VOC/gal}$$~~

~~A = Daily volume weighted average in pounds VOC per gallon
 C = VOC content of coating in pounds VOC per gallon
 U = usage rate of coating in gallons per day~~

For Line 1:

$$3 (C_a * U) \quad \# \quad 3 (C_l * U)$$

C_a = actual VOC content of coating in pounds of VOC per gallon of coating, less water
 C_l = limited VOC content of coating in pounds of VOC per gallon of coating, less water
 P-1-1 limit is 3.5 lb/gal P-1-2 limit is 3.5 lb/gal P-1-3 limit is 4.3 lb/gal
 U = actual usage rate of coating in gallons per day

For Line 2:

$$3 (C_a * U) \quad \# \quad 3 (C_l * U)$$

C_a = actual VOC content of coating in pounds of VOC per gallon of coating, less water
 C_l = limited VOC content of coating in pounds of VOC per gallon of coating, less water
 P-2-1 limit is 3.5 lb/gal P-2-2 limit is 3.5 lb/gal P-2-3 limit is 4.3 lb/gal
 U = actual usage rate of coating in gallons per day

D.1.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 **and** D.1.2 the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily or monthly, as specified below, and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 **and** D.1.2.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (2) A log of the dates of use;
- (3) A.
- The volume weighted VOC content of the clear coatings used for each day for **each** paint booths P-1-3, P-1-4, P-2-3, P-2-4, P-2-5A, and P-2-5B
- B.
- The volume weighted VOC content of non-clear or air-dried coatings for each day for paint booth P-1-4
- C.
- The volume weighted VOC content of the **coatings dried at temperatures exceeding 90°C** used for each day for paint booths P-1-1, P-1-2, P-2-1 and P-2-2 **each coating production line 1 and 2.**

Comment #6:

“Conditions D.1.4 Preventive Maintenance Plan: *We would request that this condition amended to read as follows:*

‘A Preventive Maintenance Plan, in accordance with Section B- Preventive Maintenance Plan, of this permit, is required for the control devices for these facilities.’

This proposed change would make it clear that the preventive maintenance plan is only required for the dry filters. We think that this is appropriate, since preventive maintenance on the production equipment itself would not effect emission levels.”

Response #6:

The requirement to maintain a Preventive Maintenance Plan is applicable to any facility that is required by 326 IAC 2-1-2 (Registration) and 326 IAC 2-1-4 (Operating Permits), to obtain a permit. Any preventive maintenance that could effect emissions from the facilities in question should be listed in the Preventive Maintenance Plan. Electrodeposition components, spray paint nozzles, etc., would require preventive maintenance periodically to insure that they continue to function properly. There will be only the following change in Condition D.1.4:

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for ~~this facility~~ **these facilities** and any control devices.

Comment # 7:

“ Conditions D.1.8 and D.1.9, Compliance Monitoring. We would request that these conditions (as well as the associated record keeping requirements found in condition D.1.10(b)) be eliminated from the permit. The use of the dry filters for any of the paint booths is not required to comply with the applicable PM emission limits in 326 IAC 6-3. For the various paint booths the process weight rate (P) is 14,400 lbs./hr (180 parts/hr x 80 lbs./part which results in an allowable emission rate of 15.4 lbs./hr. The worst case uncontrolled particulate emissions from the paint booths comes from the overspray from the clear coat painting operations and is calculated as follows:

$$2 \text{ gallons/hr} \times 8.28 \text{ lbs./gallon} \times 0.61 \text{ lb solids/lb paint} \times (1-0.6) = 4.04 \text{ lbs./hr.}$$

Since the actual uncontrolled emissions are much lower than the allowable emissions, the Dry filters used with the paint booths are not required to comply with the process weight limits.”

Response # 7:

The OAQ agrees that in this case, the use of dry filters may not be necessary for compliance with 326 IAC 6-3. However, the compliance monitoring of the dry filters should still be used as a trigger for possible responsive action to be taken at the coating operations. Filters are functionally related to overspray, the inspections/record keeping of which would be required regardless of the presence or absence of filters. No change will be made in the permit conditions.

Comment #8:

“Condition D.1.10 Record Keeping Requirements. Paragraph (a) of this condition should be amended to reference Condition D.1.2 as well as Condition D.1.1. In addition, we would request that paragraphs (a)(3)(A), (B) and (C) be amended to read as follows, consistent with our comments on Condition D.1.1.

- (A) The allowable and actual VOC emissions for each day for Line One (Emission Units P-1-1, P-1-2, P-1-3, P-1-4).
- (B) The allowable and actual VOC emissions for each day for Line Two (Emission Units P-2-1, P-2-2, P-2-3, P-2-4, P-2-5A, and P-2-5b).
- (C) (Deleted)”

Response #8: Please see Response # 5.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: MasterGuard Corporation
Source Address: 1200 East Eighth St. Veedersburg, IN
Mailing Address: 1200 East Eighth St. Veedersburg, IN 47987
Part 70 Permit No.: T045-10130-00011
Facility: ~~A#~~Paint Booths **P-1-3, P-1-4, P-2-3, P-2-4, P-2-5A, P-2-5B, P-1-1, P-1-2, P-2-1, P-2-2**
Parameter: **Input VOC**
Limit: < ~~240~~**239** tons/year

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	Input VOC This Month	Input VOC Previous 11 Months	Input VOC 12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: MasterGuard Corporation
Source Address: 1200 East Eighth St. Veedersburg, IN
Mailing Address: 1200 East Eighth St. Veedersburg, IN 47987
Part 70 Permit No.: T045-10130-00011

This form consists of 2 pages

Page 1 of 2

- | | |
|----------|---|
| 9 | 1. This is an emergency as defined in 326 IAC 2-7-1(12) |
| C | The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and |
| C | The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16 |

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: MasterGuard Corporation
Source Address: 1200 East Eighth St. Veedersburg, IN
Mailing Address: 1200 East Eighth St. Veedersburg, IN 47987
Part 70 Permit No.: T045-10130-00011

Months: _____ to _____ Year: _____

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**Appendix A: Emissions Calculations
VOC, Particulate, and Daily Volume Weighted Average
From Surface Coating Operations**

page 14

Company Name: Master Guard
Address City IN Zip: Veedersburg
CP: T045-10130-00011
Plt ID: 045-00011
Reviewer: B.J.Goldblatt
Date: 20 August 99

Material	Density (Lb/Gal)	Weight % Volatile (H ₂ O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Line 1																
CR640 E-Coat Resin	8.8	64.60%	63%	1.9%	66.14%	31.99%	0.054	180	0.49	0.17	1.60	38.51	7.03	0.00	0.52	100%
CP504 E-Coat Paste	10.4	53.29%	42%	11.3%	52.19%	32.14%	0.012	180	2.45	1.17	2.53	60.80	11.10	0.00	3.65	100%
NA 101 E-Coat Solvent	7.5	100.00%	0.0%	100.0%	0.0%	0.00%	0.0006	180	7.52	7.52	0.81	19.49	3.56	0.00	N/A	100%
2148 A6539 Basecoat	9.4	49.22%	0.0%	49.2%	0.0%	35.02%	0.025	180	4.65	4.65	20.91	501.81	91.58	37.79	13.27	60%
UCC1001N Clearcoat	8.3	38.77%	0.0%	38.8%	0.0%	54.49%	0.025	180	3.21	3.21	14.45	346.70	63.27	39.97	5.89	60%
UCC1001N Clear Undercoat	8.3	38.77%	0.0%	38.8%	0.0%	54.49%	0.0125	180	3.21	3.21	7.22	173.35	31.64	19.99	5.89	60%

Line 2																
CR640 E-Coat Resin	8.8	64.60%	63%	1.9%	66.14%	31.99%	0.054	180	0.49	0.17	1.60	38.51	7.03	0.00	0.52	100%
CP504 E-Coat Paste	10.4	53.29%	42%	11.3%	52.19%	32.14%	0.012	180	2.45	1.17	2.53	60.80	11.10	0.00	3.65	100%
NA 101 E-Coat Solvent	7.5	100.00%	0.0%	100.0%	0.0%	0.00%	0.0006	180	7.52	7.52	0.81	19.49	3.56	0.00	N/A	100%
2148 A6539 Basecoat	9.4	49.22%	0.0%	49.2%	0.0%	35.02%	0.025	180	4.65	4.65	20.91	501.81	91.58	37.79	13.27	60%
UCC1001N Clearcoat	8.3	38.77%	0.0%	38.8%	0.0%	54.49%	0.025	180	3.21	3.21	14.45	346.70	63.27	39.97	5.89	60%
UCC1001N Clear Undercoat	8.3	38.77%	0.0%	38.8%	0.0%	54.49%	0.0125	180	3.21	3.21	7.22	173.35	31.64	19.99	5.89	60%

Chrome Line																
UCC1001N Clear Undercoat	8.3	38.77%	0.0%	38.8%	0.0%	54.49%	0.01250	180	3.21	3.21	7.22	173.35	31.64	19.99	5.89	60%

	Density (Lb/Gal)	Cleanings per day	Gal per cleaning													
Gun Cleaning																
2173 (xylene)	7.26	2	14	100.00%	0.00%	0.00%	N/A	N/A	7.26	7.26	N/A	203.28	37.10	0.00	N/A	N/A

Potential Emissions Total

102.28 2657.92 485.07 215.48

Daily Volume Weighted Average for Line 1 - paint booths P-1-1 and P-1-2

1.92610

Daily Volume Weighted Average for Line 2 - paint booths P-2-1 and P-2-2

1.92610

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) *Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Gun Cleaning Xylene Potential VOC pounds per day = Density (lb/gal) * Cleanings per day * Gal per cleaning * Weight % organics

Gun Cleaning Xylene Potential VOC tons per year = Density (lb/gal) * Cleanings per day * Gal per cleaning * Weight % organics * (1 ton/2000 lb) * (365 days/yr)

surcoat.wb3

Daily Volume Weighted Average = Sum{[Pounds of VOC per Gallon coating less water(lb/gal)] * [Gal of Material (gal/unit)*Maximum(unit/hr)*24hr/day]} / Sum[Gal of Material(gal/unit)*Maximum(unit/hr)*24hr/day]

Daily Volume Weighted Average calculations sum values for E-coat Resin, E-coat Paste, E-coat Solvent, and basecoat

Appendix A: Emission Calculations
HAP Emission Calculations

page 15

Company Name: Master Guard Corp.
Address : 1200 East Eighth Street
City IN Zip: Veedersburg, IN 4798
CP: T045-10130-00011
Pit ID: 045-00011
Reviewer: B.J. Goldblatt
Date: 20 August 1999

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % HAP#1	Weight % HAP#2	Weight % HAP#3	Weight % HAP#4	Weight % HAP#5	Emissions HAP#1 (ton/yr)	Emissions HAP#2 (ton/yr)	Emissions HAP#3 (ton/yr)	Emissions HAP#4 (ton/yr)	Emissions HAP#5 (ton/yr)	Total HAP (ton/yr)
Line 1														
CR640 E-Coat Resin	8.8	0.054	180	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
CP 504 E-coat Paste	10.37	0.012	180	0.00%	0.00%	0.00%	0.56%	0.00%	0.00	0.00	0.00	0.55	0.00	0.55
NA101 E-Coat Solvent	7.53	0.0006	180	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
2148-A6539 Basecoat	9.46	0.025	180	8.52%	0.69%	1.89%	0.00%	0.00%	15.89	1.29	3.52	0.00	0.00	20.70
UCC1001N Clearcoat	8.3	0.025	180	11.30%	2.44%	2.45%	1.68%	0.15%	18.49	3.99	4.01	2.75	0.25	29.48
UCC1001N Clear Undercoat	8.3	0.0125	180	11.30%	2.44%	2.45%	1.68%	0.15%	9.24	2.00	2.00	1.37	0.12	14.74

Line 2														
CR640 E-Coat Resin	8.8	0.054	180	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
CP 504 E-coat Paste	10.37	0.012	180	0.00%	0.00%	0.00%	0.56%	0.00%	0.00	0.00	0.00	0.55	0.00	0.55
NA101 E-Coat Solvent	7.53	0.0006	180	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
2148-A6539 Basecoat	9.46	0.025	180	8.52%	0.69%	1.89%	0.00%	0.00%	15.89	1.29	3.52	0.00	0.00	20.70
UCC1001N Clearcoat	8.3	0.025	180	11.30%	2.44%	2.45%	1.68%	0.15%	18.49	3.99	4.01	2.75	0.25	29.48
UCC1001N Clear Undercoat	8.3	0.0125	180	11.30%	2.44%	2.45%	1.68%	0.15%	9.24	2.00	2.00	1.37	0.12	14.74

Chrome Line														
UCC1001N Clear Undercoat	8.3	0.0125	180	11.30%	2.44%	2.45%	1.68%	0.15%	9.24	2.00	2.00	1.37	0.12	14.74

	Density (Lb/Gal)	Cleanings per day	Gal per cleaning											
Gun cleaning														
2173 (xylene)	7.26	2	14	100.00%	0.00%	0.00%	0.00%	0.00%	37.10	0.00	0.00	0.00	0.00	37.10

Total Potential Emissions 133.57 16.54 21.08 10.72 0.86 182.77

METHODOLOGY

HAPS Emission Rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Gun cleaning -Xylene Emmision Rate (tons/yr) = Density (lb/gal) * Cleanings per day * Gal per cleaning * Weight % HAP * 1 ton/2000 lb * 365 days/yr

LEGEND

HAP#1 Xylene
HAP#2 Toluene
HAP#3 Ethyl Benzene
HAP#4 Methyl Isobutyl Ketone
HAP#5 Cumene

Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler
Company Name: Master Guard Corp.
Address City IN Zip: Veedersburg
CP: T045-10130-00011
Plt ID: 045-00011
Reviewer: B.J.Goldblatt

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

23.0

201.5

Pollutant						
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	7.6	7.6	0.6	100.0	5.5	84.0
Potential Emission in tons/yr	0.8	0.8	0.1	10.1	0.6	8.5

*PM emission factor is filterable PM only. PM10 emission factor is condensable and filterable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

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updated 4/99

Natural Gas Combustion Only

page 17

MM BTU/HR <100**Small Industrial Boiler****HAPs Emissions****Company Name: Master Guard Corp.****Address City IN Zip: Veedersburg****CP: 10130****Plt ID: 045-00011****Reviewer: B.J.Goldblatt****Date: 4 June 1999****HAPs - Organics**

Emission Factor in lb/MMcf	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	2.116E-04	2.518E-07	1.574E-05	3.777E-04	7.135E-07

HAPs - Metals

Emission Factor in lb/MMcf	Lead	Cadmium	Chromium	Manganese	Nickel
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.049E-07	2.308E-07	2.938E-07	7.974E-08	4.407E-07

Methodology is the same as page 16

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.